

## OKLAHOMA ETHICS COMMISSION

December 19, 2025

### Special Meeting

#### 1. Call to Order.

Chair Justin Meek ["Meek"] called to order the meeting of the Ethics Commission of the State of Oklahoma ["Commission"] on Friday, December 19, 2025, at 10:00 am. in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma, after confirming the agenda and notice were properly given.

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

Roll was called to determine the existence of a quorum. Commissioners present were Joe Lucas ["Lucas"], 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, and Assistant Compliance Officer Aniston Emory.

**Observing all or part of the meeting:** Erik Parker, Media; Brad Clark, Attorney/General Counsel; Ashton Burch, Staff; Emma Murphy, Media; Scott T. Glover, RFD & Assoc. Inc.; Erik Dietz, RFD & Assoc. Inc.; Deborah Torres, State Employee; Tevis Hills, State Employee; Alex Gladden, Oklahoman; Denise Lawson, Attorney; H.J. Reed, OKSPA; Brett Robinson, Lobbyist/Attorney; Dylan Brown, KFOR Media; Todd Jones, KFOR/Media; Tres Savage, NonDoc; John Rose, Project Manager; Ryan Hayne, OCPA; Matt Duehning, Senate; Lionel Romos, Media; Kimberly Conyer, Director of Advocacy for Goodwill; Paige Taylor, Media; and Doug Hoke, The Oklahoman.

#### 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.

[Bruce Boone] No announcements.

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 December 19, 2025. [Chair Meek]**

**Motion:** Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on December 19, 2025.

**Second:** Commissioner Lucas

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

**Motion Carried**

6. **Proposed Executive Session.** Consideration, discussion, and possible action to enter Executive Session, as authorized by 25 O.S. 2021, § 307 (B)(4), (11)(e)(2) and (11)(e)(6), and 2005 OK AG 29, ¶12, for the purpose of having confidential communications between the Commission and its counsel, regarding the cases and complaints identified in i below about pending investigations, claims, or actions; and regarding the State’s contractual rights and possible injury under the contract between the Commission and RFD & Associates, Inc., relating to the Commission's duties under Article 29 of the Oklahoma Constitution, the disclosure of which would impair the ability of the Commission to proceed in the public’s interest; and regarding reinstatement or reactivation of the prior Guardian System and reengagement with Civix relating to the Commission's duties under Article 29 of the Oklahoma Constitution, the disclosure of which would impair the ability of the Commission to proceed in the public’s interest;. Chair Meek

- i. Case No. 2022-25, alleging violations of Campaign Finance Ethics Rule 2; State of Oklahoma ex rel. Oklahoma Ethics Commission v. Pittman, Oklahoma County District Court, Case No. CV-2025-2636.

**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, regarding the State’s contractual rights and possible injury under Commission contracts, and regarding the Commission’s duties under Oklahoma law, the disclosure of which would seriously impair the ability of the Ethics Commission to consider or process claims, identify business continuity, or conduct pending investigation(s), litigation, or proceeding in the public interest or violate confidentially requirements under Oklahoma law and the Ethics Rules 6.5 and 6.9.

- i. Vote to enter Executive Session.

**Action to enter Executive Session.**

**Motion:** Commissioner Lucas moved to enter closed executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 6.

**Second:** Commissioner Wilt

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

**Motion Carried to enter Executive Session at 10:04am.**

**EXECUTIVE SESSION** pursuant to 25 O.S. 2021, § 307 (B)(4), (11)(e)(2) and (11)(e)(6), and 2005 OK AG 29, ¶12, *Chairman directs all other persons in attendance to the public meeting to exit the room until the Commission returns to regular session, and Commissioners will enter Executive Session;*

*Chairman invites the public back into the room and waits for them to re-enter and be seated.*

ii. Vote to Exit Executive Session.

**Action to exit Executive Session.**

**Motion:** Commissioner Johnson moved to exit executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 6.

**Second:** Commissioner Wilt

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

**Motion Carried to exit Executive session at 11:31 am.**

**7. Possible action on the numbered matters discussed above in Executive Session.**

**Motion:** Vice Chair Weintraub moved to terminate the contract with RFD & Associates, Inc. and to authorize the Executive Director to issue the Termination Letter to RFD immediately upon a majority vote of this Commission. Weintraub further moved to retain the Oklahoma Attorney General's office to determine what legal and equitable remedies, if any, the Commission can pursue and authorize the AG's office to do so.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved to reinstate and reactivate the prior vendor Guardian System and to approve the vendor contract under a statewide contract, to provide immediate online filing and campaign reporting and public access, and to meet the Ethics Commission's

Constitutional duties. Weintraub further moved to partner with OMES and the Attorney General's office to do so.

**Second:** Commissioner Johnson

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

**Motion Carried.**

8. **Public Hearing: Consideration of Ethics Rules Amendments (ERA). The proposed amendments modify the Constitutional Ethics Rules published at Title 74, Chapter 62, Appendix 1.**

1) Consideration of **ERA 2025-01**. This amendment modifies Ethics Rules 2.19.

- a. Executive Director Bruce Boone explains that the amendment to modify Rule 2.19 is to increase the cash contribution limit from \$50.00 dollars to \$200.00 dollars.

2) Consideration of **ERA 2025-02, Options 1 and 2**. This amendment is to modify Ethics Rule 2.48.

- a. Executive Director Bruce Boone explained that there are two options to modify Rule 2.48. Both options would add a provision allowing committees with remaining funds at the time of dissolution to use those funds for exploratory activities. Option 1 would extend the dissolution time limit to six months, while Option 2 would extend the time limit to one year.

3) Consideration of **ERA 2025-03**. This amendment modifies Ethics Rule 2.79.

- a. Executive Director Bruce Boone explains that this modification is to update the definition of a PAC which is a Political Action Committee to include any one person or more than one individual.
- b. Chair Meek stated that he had received feedback on the matter, which was well received. He suggested that the Commission review how other states address similar laws to ensure compliance and consider forming an exploratory committee or working group for further review.
- c. General Counsel Kerr added that she also received substantial feedback from the community regulated by the Commission and their legal counsel expressing concerns that expanding the definition of a PAC too broadly could encompass unintended entities. She noted that there may be a more narrowly tailored approach

to address disclosure requirements and increase transparency without creating unintended consequences.

- d. Executive Director Bruce Boone noted that part of the intent is to increase transparency of Dark Money expenditures and provide the public with greater awareness. She mentioned that other states are exploring various approaches, often involving litigation, and that Representative Blancett has several proposals she intends to present to the Commission. Executive Director Bruce Boone suggested that the Commission might consider waiting to review these additional proposals and potentially pursue a comprehensive package or multiple rule changes addressing Dark Money and related expenditures.
- e. Ryan Hayne, Vice President for Legal Affairs of the Oklahoma Council of Legal Affairs, a 501(c)(3) organization, expressed concern that the proposed rule could affect their organization because they raise funds and engage in spending on state questions and ballot initiatives. He noted that the rule does need to be updated just not how it is currently drafted, and he offered to participate in an exploratory committee if one is formed.

4) Consideration of **ERA 2025-04, Options 1 and 2**. The amendment to Ethics Rule 2.116.

- a. Executive Director Bruce Boone presented two modification options for the Commission's consideration. Option 1 would add a provision addressing committees with remaining funds at the time of dissolution and extend the dissolution period to six months. Option 2 would add the same provision while extending the dissolution period to one year.
- b. Comment by Commissioner Johnson asked whether there were any pros or cons the Commissioners should consider when determining whether the timeframe should be six months or one year.
- c. General Counsel Kerr stated that she received significant feedback indicating that the current 90-day timeframe is insufficient. Most individuals supported extending the period, with the one-year option appearing to be more popular. The general consensus favored any extension beyond the existing 90 days.

5) Consideration of **ERA 2025-05**. The amendment to Ethics Rule 5.2.

- a. Executive Director Bruce Boone explained that the modification is to add definitions for "traditional business expenses" and "de minimis amounts."

- b. Comment by Commissioner Lucas stated that to comply with other parts of the rules and strike the word meals and the amendment should put food and beverage.
- c. Comment by Executive Director Bruce Boone clarified that this is a separate amendment and coincides with Rule 5.2 modification that would add a definition for traditional business expense.

6) Consideration of **ERA 2025-06**. The amendment to Ethics Rule 5.3.

- a. Executive Director Bruce Boone explained that this modification would be adding a provision for Lobbyist disclosure of countries of particular concern.
- b. Comment by Chair Meek questioning what is a country of particular concern.
- c. Comment by General Counsel Kerr explained it is identified by the U.S. Department of States on their website. It is a list that is changed regularly. It is a list of countries that the U.S. Government has listed as countries of concern and that caution should be taken when doing business with these countries.

7) Consideration of **ERA 2025-07**. The amendment to Ethics Rule 5.5.

- a. Executive Director Bruce Boone explained that the modification would add a provision requiring lobbyists to disclose activities related to countries of particular concern. The provision would be included as a separate section within the Rules to ensure comprehensive coverage.
- b. Comment by Commissioner Wilt is asking if there somewhere else in the Rules for non-compliance with the disclosure.
- c. Executive Director Bruce Boone noted that the existing provision addressing penalties and fees would also apply to this modification. She added that proposed legislation may seek to expand the provision, allowing the Commission to apply civil penalties and enabling the Attorney General to pursue criminal penalties for violations.
- d. Comment by Commissioner Lucas regarding who would determine particular concern.
- e. Executive Director Bruce Boone stated that the relevant countries could be identified using the U.S. State Department's list. The Commission would not create its own list but would refer to the State Department's list for guidance.

8) Consideration of **ERA 2025-08**. The amendment to Ethics Rule 5.6.

- a. Executive Director Bruce Boone explained that this modification is to add a provision for traditional business expenses.
- b. Comment by Commissioner Lucas inquired if this change is similar to Rule 5.2?
- c. Comment by Executive Director Bruce Boone stated yes, it is similar to Rule 5.2.

9) Consideration of **ERA 2025-09**. The amendment to Ethics Rule 5.8.

- a. Executive Director Bruce Boone explained that this modification would repeal Rule 5.8 in its entirety. If the Commission moves forward with changes to the other rules regarding what constitutes a gift and how those rules are defined, this section will become obsolete.

10) Consideration of **ERA 2025-10**. The amendment to Ethics Rule 5.16.

- a. Executive Director Bruce Boone explained that this is a modification adding a provision for Lobbyist principals to provide food and beverage for legislative sessions to include either.

9. **Consideration, discussion, and possible action on proposed Staff Memorandum 2025-01 related to Rule 5.14.**

**Motion:** Vice Chair Weintraub moved to approve Staff Memo 2025-01 as presented as it related to Rule 5.14.

**Second:** Commissioner Wilt

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

**Motion Carried.**

10. **Consideration, discussion and possible action on request for waiver of Ethics Rule 5, Lobbyist Registration and Reporting, based upon a preexisting relationship pursuant to Rule 5.25. Chair Meek**

W-25-01, Request by Ms. Raegan Conger for a waiver of Rules for preexisting relationship with Dan Patten.

**Motion:** Commissioner Wilt moved pursuant to Ethics Rule 5.25, to approve **Waiver Request W-25-01**, finding that the purposes of these Rules will not be impeded or hindered by the waiver.

**Second:** Commissioner Lucas

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

**Motion carried.**

**Action to enter Executive Session.**

**Motion:** Commissioner Weintraub moved to enter closed executive session in room G-3 of the State Capitol Building to discuss the remaining matters listed for agenda item 6.

**Second:** Commissioner Wilt

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

**Motion Carried to enter Executive Session at 12:00 pm.**

**Action to exit Executive Session.**

**Motion:** Commissioner Wilt moved to exit closed executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 6.

**Second:** Commissioner Johnson

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

**Motion Carried to Exit Executive session at 12:42 pm.**

**Statement by Chair Meek:** Chair Meek stated the Commission will not be taking any action today on the following case discussed in Executive Session: **Case No. 2022-25.**

**11. Executive Director's Report**

**a. Budget and Legislative Update**

Executive Director Bruce Boone reviewed the annual and year-to-date budget reports and provided an overview of the first five months of the fiscal year to give context to current expenses. She noted that administrative and general operations are on track with allocated budgets and expenditures.

Information Services' annual and year-to-date budgets were also reviewed and are on track. Executive Director Boone discussed the 200 Fund, noting that while there was a significant revenue intake during the first few months, revenue declined due to the system being unavailable to process fines and fees. She noted that the fund maintains a healthy balance and does not indicate a lack of funding, and that revenue is expected to increase in the coming months. It was also noted that the system will be back online later this afternoon.



Executive Director Boone also provided a breakdown of the 211 Fund, stating that because it is a waterfall fund, it has not received revenue. She noted that the fund reached its maximum intake last year, resulting in funds excess of statutory limit being returned.

Executive Director Bruce Boone outlined the five-year appropriation history, noting a significant increase beginning in FY24. She requested that the FY27 appropriations budget be placed on hold due to issues with the contract, as there may be some fluctuation in funding needs. She also noted the possibility of a small recurring request to cover fees and licensing for the Guardian system, which is anticipated to remain consistent with FY26 levels. Budget hearings may take place in January.

Executive Director Bruce Boone discussed SB 6600, stating that she worked with Senator Guthrie on revising language related to civil and criminal provisions. She stated that the bill had reduced from approximately 27 pages to around five pages, and noted that Senator Guthrie will be proposing the bill. Executive Director Boone explained that the Ethics Rule changes may proceed without legislation; however, the legislation will require corresponding rule changes such as require countries of concern to be included in lobbyist registration, establish civil penalties within the Commission's rules, and grant the Attorney General authority to pursue criminal penalties.

Executive Director Bruce Boone also mentioned that she invited Senator Blancett to speak to the Commission regarding dark money after being unable to attend the previous month's meeting due to a scheduling conflict; Senator Blanchett may speak to the Commission at the January or February Commission meetings.

**b. Annual Report Presentation**

Executive Director Bruce Boone explained that this year's annual report outlines the Commission's areas of focus for the year, guided by the Commission's Strategic Plan and centered on three core goals: promoting public trust; operational efficiency; and detection and deterrence through education and compliance, including a proactive approach to rule violations.

Executive Director Bruce Boone noted that a significant portion of the Commission's work during the year involved developing a modernized campaign finance system. Throughout this process, data integrity was prioritized, along with system security for filers. As testing progressed, the Commission exercised active oversight, evaluated emerging risks, and took deliberate steps to ensure continuity of lawful filing and public access rather than deploying an unreliable system.

She emphasized that the Commission's actions, including the decision to terminate the contract, reflect its proactive efforts to provide the public with a reliable system. Executive Director Bruce Boone noted that although the contract has now been terminated, the Commission continued to promote public trust, operational efficiency, and detection and deterrence. She explained that the change in direction is necessary to ensure the Commission's mandate is fulfilled.

In addition to system oversight, the Commission has advanced several policy and program incentives. This includes developing framework for risk-based filing review/audits, expanding a diversion and corrective action approach to compliance, and preparing for a broader inclusion of political subdivision. Some of incentives were put on the back burner due to it being reliant on the new system. All policies are created, but some have not had a chance to be implemented into an automated fashion.

The following key performance areas were brought in front of the commission today for consideration: Accountability in government, with a target of 80%; Organizational Capacity and Stewardship to ensure that turnover is not above 18%; and an operational budget variant within 3%. Compliance and enforcement have a triage of 5 business days of receipt to ensure acting timely. The Compliance Oversight and Enforcement goal is to resolve 45-60% of matters during diversion or corrective action. Public Trust, Education and Transparency by increasing the number of trainings, guidance releases, advisory meetings, and transition updates issued to at least 18 outputs, which was met this year. The Commission operated within its appropriated budget. Resources have been managed. Priorities for next year: Deploy the Case Management System, the purchase order was signed after last month's commission meeting and will be implemented in January. Continuing to expand political subdivision enforcements which had to be put on hold due to the system issues; moving forward we will be working with a marketing group to get the word out. There will be ongoing implementation and evaluation in diversion and risk-based audits now that we'll again have a reliable system.

**c. Guardian 2.0 Update**

Executive Director Bruce Boone described the accelerated pace at which the Commission worked over the past year to implement a new system for both the regulated community and the public. She explained that following a critical contractual milestone reached in December, coordinated efforts with OMES validated that the vendor was unable to meet its contractual obligations or deliver a complete system. None of the initial milestones were completed, and as a result, the Commissioners voted to terminate the contract and pursue legal action.

Executive Director Boone noted that while additional costs were incurred due to the system's unavailability, the vendor assisted with some of those costs to a limited

extent. To ensure continued system availability, the Commission secured an extension of the Legacy Guardian system contract during the summer of 2025. A formal written warning was issued to the vendor, RFD, on August 18, 2025. Despite proposed revised go-live dates by the vendor and an amended statement of work, the vendor failed to meet the revised deadlines.

The Commissioners agreed to reinstate the Guardian system. Executive Director Bruce Boone explained that leadership changes at Civix led to the continuation of access to the Guardian system. A new contract has now been secured with Civix, and a notice will be issued later this afternoon to inform the public that access will be available.

Executive Director Bruce Boone acknowledged that numerous corrective actions were taken over several months to safeguard the funds allocated to the project. She explained that written requests were sent to the vendor, OMES was engaged, and a project manager was utilized to assist with oversight. When the critical contractual deadline was reached, the Commission determined it was necessary to decide on the appropriate course of action. She emphasized that system reliability remains a priority, ensuring that information is accurate, complete, and dependable. She stated that the Commission will be fully operational and prepared to fulfill its constitutional and statutory responsibilities, including compliance assistance, enforcement, advisory opinions, and rulemaking.

She further noted that a media announcement will be issued via social media to inform the public that the Guardian system will be restored later that afternoon. Direct notifications will also be sent to filers advising that third-quarter reports will be due January 30 and fourth-quarter reports will be due January 31, allowing a day between filing deadlines. Filers must submit third-quarter reports prior to filing fourth-quarter reports. Filers who wish to file early are encouraged to do so.

Comment by Chair Meek commented that he did not want the Commission's hard work to go underestimated. He stated that the Commission found an effective resolution to a significant challenge while continuing to focus on its other responsibilities. He expressed his appreciation and noted his hope that the press, government, and public would recognize the Commission's efforts.

## **12. Adjournment. Chair Meek**

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

**Second:** Commissioner Johnson


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

**Motion Carried.**

Meeting ended at 1:07 pm.

  
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LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

  
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JUSTIN MEEK, Chair