

OKLAHOMA ETHICS COMMISSION

July 10, 2025

REGULAR MEETING

1. Call to Order.

Upon notice, with the agenda being properly posted at the Commission's office at least twenty-four (24) hours prior to the commencement of the meeting and notice being filed in advance with the Office of the Secretary of State, a regular meeting of the Ethics Commission of the State of Oklahoma ["Commission"] was called to order on Thursday, July 10, 2025, at 10:00 am. Chair Justin Meek ["Meek"] opened the meeting, which was held 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 for the transaction of business. Commissioners answering present were Howard Johnson ["Johnson"], Adam Weintraub ["Weintraub"], and Chair Justin Meek ["Meek"]. A quorum of members was declared.

Staff & Visitors.

Commission staff members present at all, or part of the meeting 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 Compliance Officer Tyler Fixley.

Observing all or part of the meeting: H.J. Reed, OKSPA; David Oakley, Legislature OK; Emma Murphy, Oklahoma Voice; Eddie Fields, Former Chair; Haley Hetrick, News 9; Kala Plagg, Senate Operations; Bennett Brinkman, NonDoc; Jeff Elkins, Journal Record; Gabbey Raglin, Photographer; Barrett Powers, Attorney; and Nolan Clay, 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.

[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. **Resolution to Honor Former Chair Eddie Fields. Chair Meek and Executive Director Bruce Boone.**

Executive Director Bruce Boone delivered remarks recognizing Former Vice Chair Eddie Fields for his dedicated service throughout his legislative career and for his contributions to the Oklahoma Ethics Commission. She also shared highlights of Former Chair Fields' accomplishments beyond his role with the Commission.

Following her remarks, Executive Director Boone encouraged the Chair and fellow Commissioners to take photos with Former Chair Fields in recognition of his service.

Motion: Commissioner Johnson moved to adopt the proposed resolution in honor of former Chair Eddie Fields.

Second: Commissioner Weintraub

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

Motion Carried

6. **Consideration, discussion, and possible action on minutes for the regular meeting and executive session held June 12, 2025. [Chair Meek]**

Motion: Commissioner Weintraub moved to approve the minutes for the regular meeting and executive session held on June 12, 2025.

Second: Commissioner Johnson

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

Motion Carried

7. **Executive Director's Report**

a. **Compliance Update**

Executive Director Bruce Boone noted how 95% of the expected lobbyist committee reports were filed timely. Executive Bruce Boone also stated how the Ethics Commission has a high percentage of the expected special election reports being filed timely. She also said that the activity tracker numbers are a little down for our compliance officers but that is due to the Guardian testing that is going on now. Executive Director Bruce Boone also talked about trainings that are coming up that are going to focus on political subdivisions and how excited she is to partner with Oklahoma Municipal League and Oklahoma State School Board Association.

b. Budget Update

Executive Director Bruce Boone gave a report on the agency's budget and end-of-year spending for fiscal year 2025. She noted that all appropriated funds from the 191 and 195 accounts were successfully spent, as required by their 12-month budget cycle. Executive Director Boone explained that a slight surplus had occurred due to a hiring lag early in the fiscal year, but those funds were used to digitize all agency documents in partnership with Standley, one of the state's copier and digitization providers. She shared how this project was completed by June 30th and significantly improves access and efficiency compared to the prior system of manually retrieving records from the Department of Libraries. Executive Director Boone also reviewed the status of the agency's revolving funds, including the 212 Fund, which supports the Guardian system replacement that recently received \$1 million to carry the project through completion. She pointed out that the 200 Fund reached its statutory cap of \$150,000 in January for the first time, causing excess collections to flow into the 211 Fund and, after hitting \$350,000 total, into the General Revenue Fund.

c. Guardian Update

Executive Director Bruce Boone provided an update on the Guardian 2.0 system transition. She noted that the original July 1st go-live date was delayed due to data conversion issues, but Civics, the current Guardian system vendor, agreed to extend the current system by three months. The new launch is expected just after Labor Day, in early September, with training scheduled from late August through October to ensure a smooth rollout. External testing with lobbyist groups will begin next week. While a few risks remain, contingency plans are in place. Executive Director Bruce Boone also shared that Civics requested a letter of reference for granting the extension and said she would draft one focused on the extension partnership for the Commission to review at the next meeting.

d. LOFT Update

Executive Director Bruce Boone gave an update on the diversion program discussed with LOFT, noting its success despite system limitations. She explained that 77% of individuals who received proposed compliance orders in 2025 opted into the diversion program, which includes reduced fines and one-on-one training with their assigned compliance officer. Executive Director Bruce Boone emphasized the program's role in building relationships and improving future compliance. She commended the legal team for managing the process manually and shared positive participant

feedback. Also noted for those who decline the diversion program, formal administrative hearings remain available.

Question from Commissioner Johnson asked what the fine would be and if it would be reduced by 50%?

Comment by Executive Director Bruce Boone answered that it depends on what the fine is.

Question from Commissioner Johnson asked how the administrative hearing would work?

Comment by Executive Director Bruce Boone stated that it operates like an informal court hearing.

Comment by General Counsel Margaret Kerr also noted that the matter falls under the Administrative Procedures Act, which means it can be appealed in District Court.

e. Rules Working Groups

Executive Director Bruce Boone gave an update on upcoming Rules working Groups. She explained that, similar to last year, the agency will engage stakeholders statewide to gather input on potential rule changes. Topics this year include a proposed FARA rule from Representative Doyle, surplus funds and campaign account closure deadlines, gifts to officeholders, and digital currency. Executive Director Bruce Boone noted inconsistencies in the current rules, especially regarding timelines for outgoing officeholders—and said the working groups will explore possible revisions. She invited the commissioners and the public to participate, suggesting a mix of in-person and virtual meetings to increase accessibility across the state.

Comment by Commissioner Weintraub that he thinks it allows more inclusion and likes the idea.

f. Open Meeting Update

Executive Director Bruce Boone shared that work is underway to make meetings publicly accessible to promote transparency. She noted that the team is still finalizing Zoom licensing, which has proven more complex than expected. There's also been a request to share the current PowerPoint presentation used in meetings. She stated that unless there are objections, it may be released as it likely falls under the Open Records Act.

Comment by Chair Meek that he does not see any issues with that and he thinks that it fits in with our purpose of being transparent.

Question from Commissioner Johnson asked how much money would that be?

Comment by Deputy Director Jeremy Rogers stated that it would be about \$1,000 a year.

Comment by Executive Director Bruce Boone that it will get more use than just the meetings.

8. Consideration, discussion, and possible action on potential rule change to add provision related to acceptance of Digital Currency.

General Counsel Kerr reported to the Commission about issues related to digital currency if the Commission wanted to consider a rule change. She mentioned digital contributions pose unique challenges—such as the inability to deposit them like traditional funds, liquidation, and how to value contributions at fair market value. She also stressed the importance of rules that accommodate smaller campaigns without full-time treasurers.

Comment by Vice Chair Weintraub that 10 days is a long time for digital currency and expressed reluctance.

Comment by General Counsel Margaret Kerr that tax benefits may motivate digital donations.

No action was taken at this time.

9. 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.

Executive Director Bruce Boone noted that during a recent conversation with Pro Tem Paxton about rule-related matters, there were concerns stemming from recent events in Minnesota. Specifically, the concerns related to the safety of legislators, both at the Capitol and at home. There's growing interest in whether the rules allow for measures to improve personal safety at home—often referred to as “hardening your home.”

Comment by Vice Chair Weintraub about looking to see what Minnesota is doing.

Comment by Executive Director Bruce Boone that the concern is rooted in ensuring that individuals from all financial backgrounds can safely serve in office. She noted that the legislature has expressed a strong preference for establishing clear guidelines—particularly

a dollar limit on such expenses—and defining what happens to the equipment once the officeholder's term ends.

Comment by Commissioner Johnson that it sounds like a reasonable request as long as it is not being abused.

Comment by General Counsel Kerr that an advisory opinion helps to interpret and explain the rules and that there might also need to be a rule change.

Motion: Vice Chair Weintraub moved to direct the Staff to engage in the production and process of an Advisory Opinion for AOR 2025-02 regarding whether security devices and/or security services may be considered as ordinary and necessary officeholder expenses.

Second: Commissioner Johnson

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

Motion Carried

10. Consideration, discussion, and possible action on registration and administration fees for The Guardian System for FY 2026 for the following entities.

- a. Annual fee for lobbyists, legislative liaisons, and lobbyist principals.
- b. Annual fee for Political Party Committees
- c. Annual fee for Political Action Committees
- d. Per campaign fee for Candidate Committees

Executive Director Bruce Boone explained that each year the Commission sets the registration and administration fees for entities in the Guardian system, and suggested the fees could remain unchanged, as they have 2023. She reminded the Commissioners that during the previous budget discussion, it was noted that— for the first time— the agency's fees and fines exceeded the amount they were authorized to retain, resulting in a portion being shared with the General Revenue Fund. She added that the agency is receiving strong support and funding from the Legislature, and that ongoing diversion efforts are helping reduce the need for fees and fines.

Motion: Commissioner Johnson moved to adopt no change in the administration & registration fees for FY 2026 & continue with the current FY 2025 registration & administration fees.

Second: Vice Chair Weintraub

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

Motion Carried

11. 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. 2024-5 alleging violations of Ethics Rule 3, Financial Disclosure.
- iii. Case No. 2024-11 alleging violations of Ethics Rule 4, Conflicts of Interest.
- iv. Case No. 2024-38 alleging violations of Ethics Rule 2, Campaign Finance.
- v. Complaint Numbers:
 - C-25-09
 - C-25-12
 - C-25-13

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 confidentiality requirements under Ethics Rules 6.5 and 6.9.

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

Motion: Commissioner Johnson moved to enter closed, executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 11.

Second: Vice Chair Weintraub

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

Motion Carried to go into Executive/Close session at 10:54 am.

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

Motion: Commissioner Johnson moved, I move to return to Open Session at 1:32 pm.

Second: Vice Chair Weintraub

Roll Call Vote: Weintraub – yes, Johnson – 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.

Announcement by Chair Meek prior to entertaining motions on the numbered matters discussed above in Executive Session that he did not anticipate that the Commission will take action on Case No. 2024-38 or Complaint C-25-12 during this meeting.

Motion: Commissioner Weintraub moved pursuant to Rule 6.10, to authorize the Executive Director to proceed with **Case No. 2024-5** and pursue prosecution in District Court and to make certain information public as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to authorize the Executive Director to execute the Settlement Offer as discussed in Executive Session for **Case No. 2024-11**, alleging violations of Rule 4-Conflict of Interest.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to dismiss **Complaint C-25-09**, because there is not reasonable cause to believe that violations of the Ethics Rules has occurred.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved pursuant to Ethics Rule 6.7, to open a formal investigation into **Complaint C-25-13**, based on a reasonable cause to believe that one or more violations of Ethics Rules has occurred and further move to authorize the Executive Director to make certain information public based on public interest related to this complaint as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to authorize the Executive Director to make certain information public as it is in public interest in **Case No.2022-25** as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

12. New Business. Chair Meek

General Counsel Kerr provided verbal notice of the public hearing on Advisory Opinion Request 2025-02 at the next Commission Meeting on August 14, 2025, at 10:00 a.m., and a draft of the Advisory Opinion will be distributed via GovDelivery, posted on the Commission's website, and posted on the Commission's office door 5 days prior.

14. Adjournment. Chair Fields

Motion: Commissioner Weintraub moved to adjourn the meeting.

Second: Commissioner Johnson

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

Motion Carried.

Meeting ended at 1:43 pm.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



JUSTIN MEEK, Chair