

OKLAHOMA ETHICS COMMISSION
June 12, 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, June 12, 2025, at 10:00 am. Vice 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"], Mike Wilt ["Wilt"], Adam Weintraub ["Weintraub"], and 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, Legal Intern Megan Catlin, and Compliance Officer Tyler Fixley.

Observing all or part of the meeting: H.J. Reed, OKSPA; David Oakley, Legislature OK; Joseph Pierce, Senate; Andrea Hancock, Media.

2. Open Meeting Act Compliance.

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

3. Introductions and Announcements.

Executive Director Bruce Boone announced that Vice Chair Meek is serving as Chair today because previous Chair Eddie Fields resigned after the last meeting. Fields was appointed to serve as the Executive Director for the Farm Service Agency and cannot serve in both positions. Executive Director Bruce Boone also introduced Megan Catlin, the new legal intern.

4. Chair Election. Nomination, consideration and possible action on election of Commission Chair.

Motion: Commissioner Johnson moved to elect Justin Meek as Commission Chair, whose term will begin immediately upon a vote by a majority of the Commissioners currently serving, to serve as Chair through the meeting in October 2025.

Second: Commissioner Wilt.

Roll Call vote: Weintraub – yes, Wilt – yes, Johnson – yes

Motion Carried.

5. Vice Chair Election. Nomination, consideration and possible action on election of Commission Vice Chair.

Motion: Commissioner Johnson moved to elect Commissioner Weintraub for Vice-Chair of the Commission, whose term will begin immediately upon a vote by a majority of the Commissioners currently serving, to serve as Chair through the October 2025 meeting.

Second: Commissioner Wilt.

Roll Call vote: Wilt – yes, Johnson – yes, Meek – Yes

Motion Carried.

6. 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.

7. Consideration, discussion, and possible action on minutes for the special meeting and executive session held May 1, 2025.

Motion: Commissioner Weintraub moved to approve the minutes for the special meeting and executive session held May 1, 2025.

Second: Commissioner Wilt.

Roll Call vote: Johnson – yes, Wilt – yes, Weintraub – yes, Meek – yes

Motion Carried.

8. Executive Director's Report

a. Compliance Update

Executive Director Bruce Boone presented the compliance update to the commission. She stated there has been 100% compliance with Personal Financial Disclosures (PFDs). She gave an update on the Compliance Officer's activities, efforts to provide additional training, and General Counsel's training with state entities.

b. Legislative Update

Executive Director Bruce Boone shared that Senate Bill 890 was passed allowing local candidates to register and file in the Guardian. She passed around a flyer to be given to local candidates to educate and proactively comply. We are partnering with various organizations to provide outreach and training to individuals. She also mentioned that the rules that were promulgated were approved by the Legislature. Executive Director Bruce Boone shared the public corruption bill (HB 2164) that includes a requirement for certain state executive officers to attend an educational course directed by the Ethics Commission. She wants to make this a voluntary course until the bill goes into effect in 2027 and add this into the Guardian System for tracking.

b. Budget Update

Executive Director Bruce Boone provided an update on next year's budget, noting that the Commission received the entirety of its request for fiscal year 2026, the existing budget and that we are in a good fiscal position. The annual budgeted and year-to-date amounts are very close on appropriated items.

d. Guardian System Update

Executive Director Bruce Boone announced that the current Guardian System will be shut down on June 27 at 5:00 PM. Users are encouraged to submit reports and retrieve necessary data before that time. Civix will conduct the final data export and prepare to launch Guardian 2.0 on July 1, 2025. Due to limited time and delays, the new system will go live without all planned features. A compliance team will offer in-person and virtual training during the first two weeks. Risks remain with Power BI, especially around data conversion and presentation, though contingency plans are in place.

Comment by Lobbyist HJ Reed about the good timing of how the update falls.

Comment by Deputy Director Jeremy Rogers on how OMES has been very responsive.

Question from Chair Meek about if Civix does not timely and fully do the data dump what kind of issues will arise?

Deputy Director Jeremy Rogers responds that it is a major concern but are working through those scenarios.

Comment by Executive Director Bruce Boone: Phase one and phase two, we have been allowed to prioritize what is in those phases and trying to prioritize what makes user experience easier.

e. Lobbyist Refund Update

Executive Director Bruce Boone stated that because of some previous action taken by the Commission, we were overcharging lobbyists on their registration fees by \$25. She noted that this had an impact on future revenues and impacted us this year because we needed to issue refunds. She announced that the Commission issued 730 refund checks totaling \$18,250.00. At the end of three months when the checks expired, there were 220 that had still not been cashed. Executive Director Bruce Boone stated that after individually contacting check recipients, 90 checks will be reissued. If the rest do not get claimed, those checks will go through a warrant process and become unclaimed property.

f. Livestreaming Option for Meetings

Executive Director Bruce Boone mentioned exploring the possibility of streaming the meetings. She talks about how people are requesting the live stream and how the best option for us would probably be Zoom.

Comment by Vice Chair Weintraub saying he is surprised by the interest, but doesn't see a reason not to livestream meetings.

Comment by Commissioner Johnson saying their city council does the livestream.

Comment by Chair Meek that he likes the idea because of transparency and education.

Question by Commissioner Johnson: Would that be a cost?

Executive Director Bruce Boone answered saying she thinks there is an annual cost for the Zoom account with minimal impact but will report back.

9. Consideration, discussion, and possible action on LOFT's recommendation to make certain administrative documents available on our website.

Director Bruce Boone discussed LOFT's recommendation on administrative compliance orders. The first thing noted is there are no minutes or video recordings for our administrative cases. She noted administrative cases do not have minutes, and it is not required to video administrative hearings. The second recommendation made is to publish compliance orders on our website. She mentioned we did research on other agencies and found that most do not

publish compliance orders. Executive Director Bruce Boone mentioned the “wall of shame” previously posted on the website years ago would take the commission backward.

Question by Commissioner Wilt: Did LOFT provide any rationale for the recommendations?

General Counsel Margaret Kerr said that LOFT specifically said transparency.

Chair Meek and Vice Chair Weintraub mention how instead of publishing every minor foul, we could carve out the fines that are more serious and repetitive.

Executive Director Bruce Boone mentioned trying to categorize these as we are working on enforcement. She mentions that if the Commission agrees, we could take that recommendation and present further consideration.

10. Consideration, discussion, and possible action on proposed Staff Memo 2025-01, Affirmative Duty to Dissolve Candidate Committee.

General Counsel Margaret Kerr discussed Staff Memo 2025-01 related to an individual who has two candidate committees open, and per Ethics Rule 2.69 the second candidate committee must be closed and dissolved in 60 days. She said an individual believed the rule was not clear and asked for a rule change, but the Commission requested a staff memo instead.

Chair Meek mentions how this goes along with our goal of transparency.

Motion: Commissioner Wilt moved to approve & publish Staff Memo 2025-01 as presented.

Second: Commissioner Johnson

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

Motion Carried

11. Consideration, discussion, and possible action on proposed Staff Memo 2025-02, acceptance of Digital Currency as a contribution.

General Counsel Margaret Kerr stated many people have reached out to our office regarding the acceptance of digital currency for contributions. In a prior meeting the Commission asked for a proposed Staff Memo. However, once she began researching the topic, many additional questions arose, and likely a rule change would be required to address the issue.

Vice Chair Weintraub asked how could treasurers handle digital currency contributions since they are so volatile.

Most agree that this will probably require a rule change.

General Counsel Kerr shared that a few states do not accept digital currency at all, and some allow with restrictions. She mentioned the next item on the agenda relates to the same topic.

12. Consideration, discussion, and possible action on proposed Advisory Opinion Request AOR 2025-01 regarding acceptance of Digital Currency.

General Counsel Kerr stated that similar to the proposed staff memo just discussed, the issues in the AOR would likely require a rule change if the Commissioners wanted to pursue acceptance of digital currency as a contribution.

Motion: Commissioner Weintraub moved for the staff to research and advise the commission regarding digital currency so the Commission could determine if they wanted to move forward with a proposed rule change, and if so, to provide 30 days' notice as required by the rules.

Second: Commissioner Wilt

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

Motion Carried

13. 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. Meek.

- i. Case No. 2024-11 alleging violations of Ethics Rule 4, Conflict of Interest.
- ii. Case No. 2024-14 alleging violations of Ethics Rule 2, Campaign Finance.
- iii. Case No. 2022-12 alleging violations of Ethics Rule 2, Campaign Finance.
- iv. Case No. 2022-25 alleging violations of Ethics Rule 2, Campaign Finance.
- v. Complaint Numbers:
 - C-24-40
 - C-25-10
 - C-25-08
 - C-25-11

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.

v. **Action to enter Executive Session.**

Motion: Commissioner Johnson moved, under counsel's advice, to enter closed executive session in room G-3 of the State Capitol to discuss the matters listed on agenda item 13.

Second: Commissioner Wilt

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

Motion Carried to go into Executive/Close session at 11:08 am.

vi. **Action to Exit Executive Session.**

Motion: Commissioner Johnson moved to return to Open Session at **1:23 pm.**

Second: Commissioner Wilt

Roll Call Vote: Weintraub – yes, Wilt – 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.*

Motion: Commissioner Weintraub moved to submit the Settlement Offer as discussed in Executive Session for **Case No. 2024-11**, alleging violations of Ethics Rule 4 – Conflicts of Interest.

Second: Commissioner Wilt

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

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss **Case No. 2024-14**, alleging violations of Ethics Rule 2-Campaign Finance and resolve administratively.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to accept the Settlement Offer as discussed in Executive Session for **Case No. 2022-12**, alleging violations of Rule 2 – Campaign Finance.

Second: Commissioner Johnson

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

Motion Carried

Motion: Commissioner Weintraub moved to make certain information public as discussed in executive session, and pursuant to Rule 6.10, to authorize the Executive Director to proceed with **Case No. 2022-25** and pursue prosecution in District Court for violations of the May 2024 Settlement Agreement.

Second: Commissioner Wilt

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

Motion Carried

Motion: Commissioner Weintraub moved to dismiss **Complaint C-24-40**, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Johnson

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

Motion Carried

Motion: Commissioner Weintraub moved to dismiss **Complaint C-25-10**, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Johnson

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

Motion Carried

Motion: Commissioner Weintraub moved to dismiss **Complaint C-25-08**, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Wilt

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

Motion Carried

Motion: Commissioner Weintraub moved to dismiss **Complaint C-25-11**, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Wilt

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

Motion Carried

13. **New Business. Chair Fields**

No new business.

14. **Adjournment. Chair Fields**

Motion: Commissioner Johnson moved to adjourn the meeting.

Second: Commissioner Weintraub

Discussion: Weintraub denotes 16th year anniversary of his father's death.

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


Motion Carried.

Meeting ended at 1:32 pm.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



JUSTIN MEEK, Chair