

# OKLAHOMA ETHICS COMMISSION

October 6, 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 Monday, October 6, 2025, at 10:00 am. in Room G-3 of the State Building, Oklahoma City, Oklahoma, after confirming the agenda and notice having properly been given.

### **Determination of Quorum.**

Roll was called to determine the existence of a quorum. Commissioners present were Joe Lucas ["Lucas"], Howard Johnson ["Johnson"], Vice Chair Adam Weintraub ["Weintraub"], Mike Wilt ["Wilt"], 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 Compliance Officer Tyler Fixley

**Observing all or part of the meeting:** Erik Parker, Media; Emma Murphy, Media; H.J. Reed, OKSPA; Andrea Hancock, Media; and Jennifer Monies, House.

## 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.

Executive Director Bruce Boone introduced the Ethics Commission's new Commissioner, Joe Lucas, who was appointed by the Attorney General on October 1, 2025, and was sworn in on October 3, 2025.

## 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.

None.

[Commissioner Weintraub enters the meeting at 10:32 a.m.]

5. **Consideration, discussion, and possible action on minutes for the regular meeting and executive session held September 11, 2025. [Chair Meek]**

**Motion:** Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on September 11, 2025.

**Second:** Vice Chair Weintraub

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

**Motion Carried**

**Motion:** Vice Chair Weintraub moved to take a brief recess until 10:20 a.m.

**Second:** Commissioner Lucas

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

**Motion Carried**

**Motion:** Commissioner Wilt moved to reconvene.

**Second:** Vice Chair Weintraub

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

**Motion Carried**

6. **Executive Director's Report**

**a. Compliance Update**

Executive Director Bruce Boone stated that registration numbers for lobbyists and committees are around 1,500 and growing. For upcoming reporting schedules, we have an executive only lobbyist report due on October 15, and the third quarter report is due on October 31. Under the highlights of reporting, we have nearly 100% compliance in every category. We have a full plate with trainings, and trying to accommodate any training request coming in. There is a lot of interest in conflict-of-interest training which we think is a huge benefit.

**b. Budget and Legislative Update**

Executive Director Bruce Boone stated the budget was submitted by the statutory deadline of October 1. Budget includes request for recurring and additional funding for political subdivision enforcement and licensing fees for Guardian 2.0. Until we reach

a stabilization point with Guardian 2.0, we will need to continue to have that relationship with the Vendor. There is no need to request additional funds as we had to transfer fees/fines that were collected during last fiscal year into the general revenue fund as required by statute and additional is not needed to operate at this time.

We have been asked to participate in different interim studies with the legislature, such as the Foreign Agent Registration Act, and ask lobbyists to disclose if they are representing a country that might be a foreign concern. There are four or five other states that have rules regarding the Foreign Agent Registration Act. There is a lot of interest in foreign money and how it might influence elections. Bruce Boone discussed current rules that ensure contributions of foreign money are banned and the added certification requirement for treasurers and deputy treasurers about accepting foreign funding.

Question by Chair Meek – In terms of the study, how much of a problem have we seen talking to these other four states that have done some of the lobbying registration?

Statement by Executive Director Bruce Boone – We haven't seen a problem yet. The purpose would more so be awareness, being proactive, and having some knowledge of who is representing who.

### **c. Guardian 2.0 Update**

Executive Director Bruce Boone stated you will notice we have not gone live with Guardian 2.0. We are still having issues with data conversion and have talked with a lot of our stakeholders. The most important piece, given where we are in the reporting period, is to come up and to make sure we have accurate information. Because we are still seeing issues, we did not feel comfortable hitting the go live button, especially where we are in the reporting period. We want to take this additional time to ensure we feel like it is going to be the best system possible. If anyone in the public would like to request data from us, that is still available.

Question from Commissioner Johnson – Are any of the problems able to be resolved easily?

Statement from Executive Director Bruce Boone – They can be fixed. Our issue is we have spent so much time on data conversion. We have had three different data dumps from our previous vendor, and they have given us the information, but in a different format, which has caused the data conversion to take some time.

Question from Commissioner Wilt – Other than the different formats, has the prior vendor been easy to work with?

Statement from Executive Director Bruce Boone – Yes, in terms of they are responsive and provide the converted data when we ask for it, but it was not submitted in a way that made it easily discernable for the existing vendor, RFD.

#### **d. LOFT Update**

Executive Director Bruce Boone stated that a Loft evaluation was conducted earlier this year. Updates on the Commission's progress in addressing the report's recommendations have been provided at each meeting since. Many of the recommendations are already being implemented; however, the Commission has not yet added a formal case management system for tracking cases and complaints. Currently, cases are tracked using an Excel spreadsheet. Implementation of a case management system was delayed due to prioritizing getting Guardian 2.0 operational. She noted that Wingswept was recommended, but its annual cost could not be justified, as the Commission handles a relatively small number of cases each year. Clio, costing less than \$5,000 annually, was a better fit. It is cloud-based and provides case management, task and document management in one platform. Additionally, General Counsel Kerr and other legal staff are already familiar with Clio.

#### **e. Rules Working Groups**

Executive Director Bruce Boone provided an update on her meeting with the Senate working group earlier this month. She received feedback on several of the rules the Commission has already approved for promulgation this year. The discussion also covered the use of surplus funds — specifically, how the funds may be spent and the time frame allowed for their expenditure.

This feedback will be presented to the Advisory Working Group later this month for further discussion and input. So far, eight members have been confirmed for the Advisory Group. The plan is to return in November and December with some recommendations and proposed language to take to the Legislature. It was noted that meeting with the House and Senate working groups has helped establish a positive rapport that did not exist previously.

#### **f. Political Subdivision Update**

Executive Director Bruce Boone announced that the Commission's partnership with Candor has begun. Candor will be providing a statewide campaign for political subdivision outreach, including advertisements through television, radio, newspapers, emails and social media platforms such as Facebook, Instagram, and "X". An ad targeting the political subdivision's new filing procedure was presented during the meeting. Executive Director Bruce Boone mentioned that Candor is exploring

opportunities to collaborate with influencers such as former Governors and Legislators to help promote the campaign through their social media.

**7. Consideration, discussion and possible action regarding the proposed amendment to Rule 2.19 and authorization for staff to begin the rulemaking process regarding proposed amendment to Rule 2.19.** Chair Meek

Executive Director Bruce Boone explained that last year several small changes were made to the reportable contribution amounts, increasing from \$50 to \$200, following meetings with working groups. The \$50 contribution limit was raised to \$200 in Rules 2.17 and 2.20, but Rule 2.19 was overlooked. Commissioners were asked to consider whether Rule 2.19 should be amended to the \$200 contribution limit, consistent with the other rule changes.

**Motion:** Vice Chair Weintraub moved to authorize the Staff to begin the rulemaking process regarding the proposed amendment to Rule 2.19.

**Second:** Commissioner Johnson

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

**Motion Carried**

**8. 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. 2025-14 alleging violations of Ethics Rule 2, Campaign Finance.
- iii. Case No. 2024-32 alleging violations of Ethics Rule 4, Conflict of Interest.
- iv. Complaint Number(s):
  - C-25-17
  - C-25-18
  - C-25-19
  - C-25-20

**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 8.

**Second:** Commissioner Wilt

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

**Motion Carried to go into Executive/Close session at 10:59 am.**

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

**Motion:** Commissioner Johnson moved to return to Open Session at **12:38 pm**.

**Second:** Commissioner Wilt

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

**Motion Carried.**

9. 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 6.10, to authorize the Executive Director to submit an offer of Settlement in **Case 2024-32** as discussed in Executive Session.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved to dismiss **Complaint C-25-17**, because there is no reasonable cause to believe that violations of Ethics Rules has occurred.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved to authorize the Executive Director to make a public statement on **Complaint C-25-18** as discussed in Executive session.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved pursuant to Ethics Rule 6.7, to open a formal investigation into **Complaint C-25-19**, based on reasonable cause to believe that one or more violations of Ethics Rules have occurred.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved pursuant to Ethics Rule 6.7 to, open a formal investigation into **Complaint C-25-20**, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred.

**Second:** Commissioner Wilt

**Roll Call Vote:** Lucas – yes, Johnson – yes, Wilt – yes, Weintraub – 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, Complaint No. 2025-14.**

#### **10. Adjournment. Chair Meek**

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

**Second:** Commissioner Lucas

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

**Motion Carried.**

**Meeting ended at 12:46 pm.**

  
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LEE ANNE BRUCE BOONE, Executive Director

**Approved on behalf of the Commission:**

  
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JUSTIN MEEK, Chair