



OKLAHOMA

Ethics Commission



Special Commission Meeting
& Public Hearing
August 14, 2025 11:00 AM
OK State Capitol, Rm. G-3



OKLAHOMA
Ethics Commission



Call to Order

Open Meeting Act Compliance

Introductions & Announcement

**Announcements, consideration,
discussion, and possible action
on the disqualification or recusal
of any Commissioner or
Commissioners pursuant to
Ethics Rule 1.6**



OKLAHOMA
Ethics Commission



Consideration, discussion, and possible action on minutes for the regular meeting and executive session held July 10, 2025



Executive Director's Report

Open Meetings Update



➤ **zoom** Licensing

➤  PowerPoint Request



Open Meetings Update

Zoom



Oklahoma Ethics Commission

Notice of Special Meeting

Thursday, August 14, 2025

The Ethics Commission of the State of Oklahoma will hold a Special Meeting on Thursday, August 14, 2025 at 11:00 a.m. in Room G-3 of the State Capitol Building, 2300 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105.

Access the final agenda for the meeting by clicking on the link below:

We will now be live streaming the Commission meetings. To access the meeting, please click on the link below and enter the Passcode 1990 to join the live broadcast.



State Capitol • 2300 N. Lincoln Boulevard • Room G-27 • OKC, OK • 73105 (405) 521-3451 • Fax: (405) 521-4905 • E-mail: ethics@ethics.ok.gov



Twitter



Oklahoma Ethics Commission
Yesterday at 8:00 AM · 🌐

Special Commission Meeting & Public Hearing: August 14, 2025
Meeting to start 11:00 a.m. @ State Capital G-3
Agenda: <https://tinyurl.com/OECAUGUST2025AGENDA>
Watch on Live Stream: <https://us02web.zoom.us/j/85258776774>
Live Stream Passcode: 1990



Special Commission Meeting
& Public Hearing
August 14, 2025

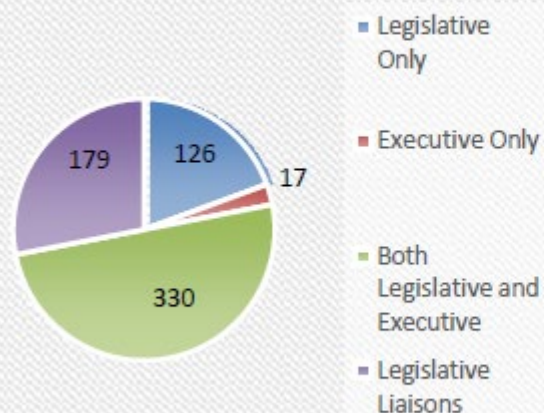


Compliance Update

THE GUARDIAN SYSTEM REGISTRANTS

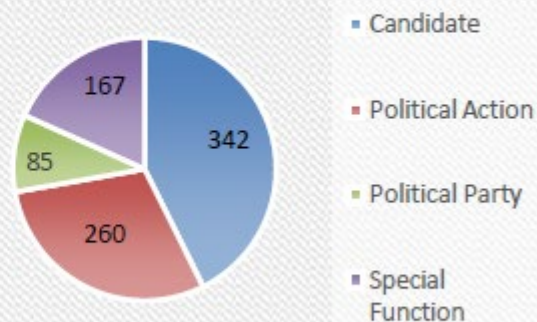
Active Filers as of July 1, 2025

Lobbyists



Total Lobbyists: 652

Committees



Total Committees: 854

Total Lobbyists and Committees: 1,506

Upcoming Reporting Schedules

Lobbyist/Liaison

Executive Only
Lobbyist
3rd Quarter –
October 15, 2025

Executive Only
Lobbyist
4th Quarter –
January 15,
2026

Legislative
Lobbyist/Liaison
2025 July-
December -
January 15, 2026

Candidates & Non-Candidate Committees

2025 2nd Quarter Due
July 31, 2025
(Candidates and non-
Candidate Committees)

2025 Pre-General
Special Election House
District 97-- Due
September 1, 2025

2025 Pre-Runoff Special Election
House District 97
- Due August 4, 2025



OKLAHOMA
Ethics Commission

Compliance Update

Reporting Highlights

98% of expected Lobbyist/Liaison reports were timely filed late/unfiled)

95% of expected Committee reports were timely filed

88% of expected special election reports

Proposed/Final Compliance Orders

Lobbyist/Liaison Compliance

12 Proposed Orders issued
3 Final Order issued

Committee Compliance

0 Proposed Orders issued
4 Final Orders issued

COMPLIANCE ACTIVITY TRACKER

DATE – JULY 2025

COMPLIANCE OFFICERS

CO#1

CO#2

CO#3

CANDIDATES/OFFICES
ASSIGNED

99

95

93

CALLS/WALK-INS

96

35

94

REPORTS REVIEWED

12

253

27

EMAIL CORRESPONDENCE

306

112

58

TOTALS

417

400

179



OKLAHOMA
Ethics Commission

Feedback from Recent Training in July 2025

Oklahoma Corporation Commission: “Conflict of Interest”

Which course did you attend in July 2025?	How effective was the instructor in delivering the course material?	How helpful did you find the course content for your work or daily life?	How would you rate your overall experience with this course?	How likely are you to recommend this course to others?	Are there any other courses you would like to see offered? (Optional)	Please share any additional comments about this course and/or OCC University in general. Your input helps us improve and serve you better! (Optional)
Ethos: Ethics in State Government 7/15/25	5	4	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25						The examples given were very realistic and relative to all state employees. I think this course is necessary for all state employees so they know there are certain things that can and cannot be done as it applies to ethics.
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25						I was disappointed the class was not geared more towards the OCC. It seems like gifts from regulated entities should have been one of the gift restrictions on the slide and she never specifically mentioned restrictions on accepting alcohol. Also, there was no clear distinction made between gifts to the state agency (i.e. for SCC) versus gifts to individual employees.
Ethos: Ethics in State Government 7/15/25	3	2	2	2		
Ethos: Ethics in State Government 7/15/25						If there has been an ethics violation, or what might be perceived as a violation, what is the statute of limitations?
Ethos: Ethics in State Government 7/15/25	4	5	4	5		
Ethos: Ethics in State Government 7/15/25						This was a great course and very informative! I look forward to any other similar training/courses. The presenter was very knowledgeable and presented the information in a clear and concise manner. The class had great information on how to apply the rules of the Ethics Commission to possible real-life examples that could impact decisions.
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25						I think all new state employees should attend this course, it's really great information and good to know.
Ethos: Ethics in State Government 7/15/25	5	5	5	5		
Ethos: Ethics in State Government 7/15/25	4	5	4	4		

Municipal Clerks:

“Update on Political Subdivision”

- Overall: Informative, well-presented, and appreciated even when not directly applicable to all municipalities.
- Guardian 2.0 portal and legal requirements for candidates were especially valued.
- Coverage of the City Clerk election document repository was noted as an important and often overlooked topic.
- Presenter described as very knowledgeable and engaging.





Budget

As of August 5, 2025

<u>Business Unit</u>	<u>Class</u>	<u>Dept</u>	<u>Bud Ref</u>	<u>Allocations</u>	<u>Pre Encumbered</u>	<u>Encumbered</u>	<u>Current Yr Exp</u>	<u>Prior Yr Exp</u>	<u>Allotment Budget</u>	<u>Available Cash</u>
29600	191									72,790.59
	19102	10	25	75,000.00	.00	.00	2,209.41	.00	72,790.59	
	19102	88	25	75,000.00	.00	.00	.00	75,000.00	.00	
				150,000.00			2,209.41	75,000.00	72,790.59	
	195									938,053.27
	19501	10	25	1,014,630.00	.00	.00	.00	1,014,630.00	.00	
	19502	10	26	1,014,630.00	.00	.00	76,576.73	.00	938,053.27	
				2,029,260.00			76,576.73	1,014,630.00	938,053.27	
	200									582,987.40
	20000	10	24	178,006.00	.00	41,501.74	.00	39,454.75	97,049.51	
	20000	10	25	277,481.00	.00	80,530.50	75,830.25	68,519.16	52,601.09	
	20000	10	26	72,722.00	.00	59,534.53	.00	.00	13,187.47	
				528,209.00		181,566.77	75,830.25	107,973.91	162,838.07	
	210									300,000.00
	21000	10	26	199,943.00	.00	.00	.00	.00	199,943.00	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				300,000.00					300,000.00	
	211									429,445.72
	21100	10	26	1,500.00	.00	.00	.00	.00	1,500.00	
	21100	88	24	164,186.00	.00	3,995.66	.00	76,129.56	84,060.78	
	21100	88	25	231,540.00	.00	6,064.69	4,008.40	60,623.26	160,843.65	
	21100	88	26	151,544.00	.00	40,317.40	8,662.22	.00	102,564.38	
				548,770.00		50,377.75	12,670.62	136,752.82	348,968.81	
	212									1,646,740.00
	21200	88	25	1,200,000.00	.00	301,796.00	8,870.00	544,390.00	344,944.00	
	21200	88	26	1,015,000.00	.00	444,839.45	.00	.00	570,160.55	
				2,215,000.00		746,635.45	8,870.00	544,390.00	915,104.55	
Grand Totals				6,459,196.00	-	978,579.97	176,157.01	2,566,703.73	2,737,755.29	3,970,016.98



Budget

Actuals as of July 31, 2025

General Operations

Department: 1000010 Admin General Operations

Account		Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511	Salary Expense	834,382	69,532	56,938.34	0.00	0.00	56,938.34	777,443.66	12,593.49	6.82	81.89
512	Insur.Prem-Hlth-Life,etc	147,054	12,255	5,735.67	1,500.00	0.00	7,235.67	139,818.33	5,018.83	4.92	59.05
513	PICA-Retirement Contributi	196,200	16,350	13,631.12	0.00	0.00	13,631.12	182,568.88	2,718.86	6.95	83.37
515	Professional Services	65,687	5,474	0.00	20,985.00	0.00	20,985.00	44,702.00	-15,511.12	31.95	383.37
519	Inter/Intra Agy Pmt-Pers S	432	36	0.00	432.00	0.00	432.00	0.00	-396.00	100.00	1200.00
521	Travel - Reimbursements	14,600	1,217	271.60	0.00	0.00	271.60	14,328.40	945.03	1.86	22.32
522	Travel - Agency Direct Pmt	7,400	617	0.00	0.00	0.00	0.00	7,400.00	616.65	0.00	0.00
531	Misc. Administrative Expen	16,415	1,368	0.00	10,429.50	0.00	10,429.50	5,985.50	-9,061.62	63.54	762.46
532	Rent Expense	700	58	0.00	609.78	0.00	609.78	90.22	-551.46	87.11	1045.58
533	Maintenance & Repair Expen	0	0	0.00	622.25	0.00	622.25	-622.25	-622.25	~	~
536	General Operating Expenses	5,900	492	0.00	0.00	0.00	0.00	5,900.00	491.65	0.00	0.00
552	Scholar.,Tuition,Incentive	25	2	0.00	0.00	0.00	0.00	25.00	2.08	0.00	0.00
601	AFP Encumbrances	0	0	0.00	24,956.00	0.00	24,956.00	-24,956.00	-24,956.00	~	~
810	Req Only	0	0	0.00	162,599.80	0.00	162,599.80	-162,599.80	-162,599.80	~	~
		1,288,795	107,399	76,576.73	222,134.33	0.00	298,711.06	990,083.94	-191,311.66	23.18	278.13
Class Funding		Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19502	GRF Duties	1,014,630	84,552	76,576.73	0.00	0.00	76,576.73	938,053.27	7,975.74	7.55	90.57
19601	GRF-Duties	0	0	0.00	357.00	0.00	357.00	-357.00	-357.00	~	~
20000	Ok Coun Campaign, Eth Rev	72,722	6,060	0.00	221,777.33	0.00	221,777.33	-149,055.33	-215,717.31	304.97	3659.68
21000	Political Subdiv Enforcemt	199,943	16,662	0.00	0.00	0.00	0.00	199,943.00	16,661.91	0.00	0.00
21100	Ethics Comm Online Filing	1,500	125	0.00	0.00	0.00	0.00	1,500.00	125.00	0.00	0.00
		1,288,795	107,399	76,576.73	222,134.33	0.00	298,711.06	990,083.94	-191,311.66	23.18	278.13
Totals for Division 10		1,288,795	107,399	76,576.73	222,134.33	0.00	298,711.06	990,083.94	-191,311.66	23.18	278.13



Budget

IS Services

Actuals as of July 31, 2025

Department: 8800020 Administrative IS Services

Account		Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511	Salary Expense	71,062	5,922	6,091.80	0.00	0.00	6,091.80	64,970.20	-169.97	8.57	102.87
512	Insur.Prem-Hlth-Life,etc	14,820	1,235	1,116.78	0.00	0.00	1,116.78	13,703.22	118.22	7.54	90.43
513	FICA-Retirement Contributi	17,524	1,460	1,453.64	0.00	0.00	1,453.64	16,070.36	6.68	8.30	99.54
515	Professional Services	742,561	61,880	0.00	450,807.77	0.00	450,807.77	291,753.23	-388,927.70	60.71	728.52
531	Misc. Administrative Expen	296,434	24,703	0.00	27,110.04	0.00	27,110.04	269,323.96	-2,407.22	9.15	109.74
532	Rent Expense	3,500	292	0.00	752.04	0.00	752.04	2,747.96	-460.38	21.49	257.85
533	Maintenance & Repair Expen	117,100	9,758	0.00	6,073.00	0.00	6,073.00	111,027.00	3,685.33	5.19	62.23
536	General Operating Expenses	0	0	0.00	414.00	0.00	414.00	-414.00	-414.00	~	~
541	Office Furniture & Equipme	3,600	300	0.00	0.00	0.00	0.00	3,600.00	300.00	0.00	0.00
810	Req Only	0	0	0.00	61,490.00	12,819.90	74,309.90	-74,309.90	-74,309.90	~	~
		1,266,601	105,550	8,662.22	546,646.85	12,819.90	568,128.97	698,472.03	-462,578.94	44.85	538.26
Class Funding		Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
20000	Ok Coun Campaign, Eth Rev	0	0	0.00	61,490.00	12,819.90	74,309.90	-74,309.90	-74,309.90	~	~
21000	Political Subdiv Enforcemt	100,057	8,338	0.00	0.00	0.00	0.00	100,057.00	8,338.08	0.00	0.00
21100	Ethics Comm Online Filing	151,544	12,629	8,662.22	40,317.40	0.00	48,979.62	102,564.38	-36,350.99	32.32	387.85
21200	Ethics Com Fil Sys Replcmm	1,015,000	84,583	0.00	444,839.45	0.00	444,839.45	570,160.55	-360,256.13	43.83	525.92
		1,266,601	105,550	8,662.22	546,646.85	12,819.90	568,128.97	698,472.03	-462,578.94	44.85	538.26
Totals for Division 88		1,266,601	105,550	8,662.22	546,646.85	12,819.90	568,128.97	698,472.03	-462,578.94	44.85	538.26
Totals for Bus Unit 29600		2,555,396	212,949	85,238.95	768,781.18	12,819.90	866,840.03	1,688,555.97	-653,890.60	33.92	407.06

Guardian 2.0

➤ **GO-LIVE: Anticipating September 2**

➤ Current Guardian System Public Shut-Off: **August 29**

➤ RFD On-Site for first few weeks of *Go-Live*

➤ **Training:** Live/In-Person & Virtual through October;
Training Material In Development (some drafts are online)

➤ **External Testers: Lobbyists & Campaign Committee Filers**

➤ Login/Registrations/Filings/Calendar Set-up/Uploads/E-Signature

➤ **On-Going RISKS**

➤ **Data Conversion:** Substantial Progress from last month

➤ **Administrative Features**

➤ **Data Analytics** for Public Facing Reports: Workaround Solution for PowerBI

➤ **CONTINGENCY PLANS**

➤ Pivots & Communication: 1 Delay thus far





OKLAHOMA
Ethics Commission

To whom it may Concern:

I am writing to provide a reference regarding the longstanding collaboration between the Oklahoma Ethics Commission and Civix, a cloud-based government software provider. Over the past decade, Civix has served as the technology partner behind the Commission's Guardian system, which has supported campaign finance operations across the state.

During a recent planned upgrade to Guardian 2.0, the Commission required additional time to complete final testing and data migration. To ensure uninterrupted service for filers, public users, and agency staff, Civix graciously agreed to extend its existing contract, demonstrating exceptional flexibility and commitment to our operations.

Civix's dedication has been vital to maintaining system stability throughout this transition period. We appreciate their ongoing support.



➤ Reference
Letter Request



OKLAHOMA
Ethics Commission



Public Transparency

- Campaign Finance Audits
- Investigator Position
- Additional Compliance Officer



Advisory Group

- Virtual and In-Person Opportunities
- Commissioner Opportunities for Involvement



OKLAHOMA
Ethics Commission

An Act

ENROLLED SENATE
BILL NO. 890

By: Daniels and Kirt of the
Senate

and

Osburn and Deck of the
House

An Act relating to campaign finance and financial disclosures; amending 11 O.S. 2021, Sections 56-101, 56-102, 56-104, 56-105, 56-106, 56-107, 56-108, 56-109, and 56-110, which relate to the Municipal Campaign Finance and Financial Disclosure Act; modifying definition; transferring certain duties from municipal clerk to the Ethics Commission; modifying certain posting requirements; amending 19 O.S. 2021, Sections 138.11, 138.12, 138.13, 138.14, 138.15, 138.16, 138.17, 138.18, and 138.19, which relate to the County Campaign Finance and Financial Disclosure Act; modifying definition; removing certain requirement for notarization; removing certain processing fee; transferring certain duties from county election board to the Ethics Commission; modifying certain posting requirements; amending 70 O.S. 2021, Sections 2-110, 2-111, 2-113, 2-114, 2-115, 2-116, 2-117, 2-118, and 2-119, which relate to the Technology Center District and Independent School District Campaign Finance and Financial Disclosure Act; transferring certain duties from school district clerk to the Ethics Commission; modifying certain posting requirements; updating statutory references; updating statutory language; and providing an effective date.

Political Subdivision Enforcement

- **Consideration, discussion and possible action of Educational Marketing Proposal for Statewide Outreach Effort**

Hearing on Advisory Opinion Request No. 2025-02

**Regarding whether Security Devices and/or
Security Services may be Considered as Ordinary
and Necessary Officeholder Expenses.**

► Initial Notice of Hearing for AOR 2025-02
provided on July 11, 2025



Hearing on Advisory Opinion Request AOR 2025-02



➤ Initial Notice of Hearing for AOR 2025-02
provided on July 11, 2025

Oklahoma State Legislature

Director Lee Anne Bruce Boone,

As I am sure you are aware, there has been a lot of attention nationally regarding the issue of safety and security for state elected officials. The tragic assassination of state representative Melissa Hortman by shooting at her home in Brooklyn Park, Minnesota last month has emphasized to me the need to evaluate what can be done to prevent such an awful event from occurring in Oklahoma.

I am exploring how we can find a way to help provide security measures in our members' residences. I know this can be costly. I am also aware that not everyone has the personal resources to install these kind of measures.

The FEC has recently codified some of their previous guidance on the matter in Final Rule – 11 CFR 113.1(g)(10) (Effective Jan 1, 2025)

Candidate and federal officeholder security. The use of campaign funds to pay for the reasonable costs of security measures for a federal candidate, federal officeholder, member of their family, and employees—as defined in [26 CFR 31.3401\(c\)-1](#)—of the candidate's campaign or the federal officeholder's office, is not personal use, so long as the security measures address ongoing dangers or threats that would not exist irrespective of the individual's status or duties as a federal candidate or federal officeholder. Disbursements for security measures must be for the usual and normal charge for such goods or services. Usual and normal charge means, in the case of goods, the price of those goods in the market in which they are ordinarily purchased, and, in the case of services, the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered. Examples of such security measures include, but are not limited to:

- (i) Non-structural security devices, such as security hardware, locks, alarm systems, motion detectors, and security camera systems;
- (ii) Structural security devices, such as wiring, lighting, gates, doors, and fencing, so long as such devices are intended solely to provide security and not to improve the property or increase its value;

- (iii) Security personnel and services that are bona fide, legitimate, and professional; and
- (iv) Cybersecurity software, devices, and services.

I am writing to ask you to interpret whether the Oklahoma Ethics rules (updated June 1, 2025) would allow for the same or a similar result.

Specifically, would Rule 2.2 (15) and Rule 2.44 which address "Officeholder expenses" include these type of expenditures.

The FEC rule does not require a personal reimbursement for such an expenditure. Do the Oklahoma Ethics Rules allow for a similar exemption.

Thank you for your assistance in this matter.

Sincerely,

Senator Lonnie Paxton
President Pro Tempore
Oklahoma Senate

Senator Julia Kirt
Minority Leader
Oklahoma Senate

Representative Kyle Hilbert
Speaker of the House
Oklahoma House of Representatives

Representative Cyndi Munson
Minority Leader
Oklahoma House of Representatives



OKLAHOMA
Ethics Commission

DRAFT Advisory Opinion 2025-02 (Cite as: 2025 OK Ethics 02)

Dear Senator Lonnie Paxton, Senator Julia Kirt, Representative Kyle Hilbert, and Representative Cyndi Munson:

We are responding to your advisory opinion request asking whether expenses for safety and security measures would be considered a valid officeholder expense under the Oklahoma Ethics Rules. Specifically, you are asking:

Are expenses incurred to implement security measures at the residences of the members of the legislature, considered a valid officeholder expense under Rule 2.44 and included within the definition of officeholder expenses in Rule 2.2(15)?

When a candidate for state office is elected for the office sought, that candidate often has funds remaining in the campaign committee account. The Ethics Rules allow the elected official to use remaining campaign funds for officeholder expenses. Rule 2.44(A) addresses officeholder expenses and provides in part:

A. Contributions to a candidate committee of a candidate who is elected to the office for which the contributions were accepted may be used to make expenditures for officeholder expenses until the expiration of the term, resignation or other vacation of the office.

This Rule makes it clear that as long as the candidate holds the office for which campaign contributions were accepted, that candidate, now an officeholder, can use those funds for officeholder expenses.

Rule 2.2(15) defines officeholder expenses:

“Officeholder expenses” means ordinary and necessary expenses incurred in connection with a candidate’s duties as holder of a state elected office, provided that the expenses are not otherwise reimbursed or paid for by the state. “Ordinary and necessary expenses” are those that would not exist but for the fact that the candidate was elected to and holds a state elective office.

This definition uses the phrase “in connection with” the candidate’s duties as an elected official. It requires that the expense incurred be an expense that is closely related to, and a direct result of, the office for which the individual has been elected.

The reference to “but for” is a test used in other places in the Ethics Rules. As used in the context of officeholder expenses, the test is whether the elected official would have incurred the expense

but for the fact that they were elected to state office. If the expense would exist with or without the elected office, it does not pass the but-for test.

Applying the parameters of Rules 2.2 (15) and 2.44 to expenses incurred for safety and security requires that we determine whether expenses incurred for safety and security measures are a direct result of and closely related to the office for which the individual has been elected. The officeholder must need security to respond to dangers or threats related to the office held, and not simply for security that any member of the public would need. Further, the dangers or threats are related not just to *any* elected office within the State of Oklahoma, but the office held by *that* elected official.

The FEC Rule, 11 CFR §113.1(g)(10), requires the security expenses “address ongoing dangers or threats that would not exist irrespective of the individual’s status or duties as a federal candidate or federal officeholder.” This requirement is similar to the but-for test: would the officeholder need security to address dangers or threats that would exist without the office? If so, they do not meet the definition of a valid officeholder expense under Oklahoma’s Ethics Rules. However, if the dangers or threats are directly related to the office for which the individual has been elected, and are incurred in connection with that office, then they would be a valid officeholder expense.

Ethics Rule 2.39 prohibits the use of campaign funds for personal use. Personal use is defined in Rule 2.39 to include use of funds to fulfill a commitment, obligation or expense of any person that would exist irrespective of the fact that the individual holds state elective office. As with Rule 2.2(15), the officeholder must make sure funds are spent only on safety and security related to the fact s/he holds office, and not safety and security that would exist outside of holding that office.

The ordinary and necessary verbiage in Rule 2.2(15) also encompasses reasonableness. Although the words “ordinary and necessary” are not specifically defined in the Ethics Rules, the plain meaning of ordinary is commonplace and not of special quality.¹ The plain meaning of necessary includes required, essential and indispensable for a particular situation.² Applying the plain meanings of ordinary and necessary requires that an officeholder who uses campaign funds for his or her safety and security expenses must ensure the expenses are ordinary, commonplace and not of special quality. Some examples of reasonable expenses for safety and security might include a security camera system, motion detectors, cybersecurity software, and monitoring services. Expenses for safety and security outside the scope of what is reasonable under the Ethics Rules include hiring a security guard or security detail, purchasing weapons, or installing complex, high-end equipment.

¹ Collins Online Dictionary. (2025). *Collins Dictionary*. Retrieved August 1, 2025, from <https://www.collinsdictionary.com/us/dictionary/english/ordinary>.

² Merriam-Webster. (n.d.) *Merriam-Webster.com dictionary*. Retrieved August 1, 2025, from <https://www.merriam-webster.com/dictionary/necessary>.





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Any tangible safety and security items purchased by the officeholder should be disposed of in compliance with Rule 2.118.

It should be noted that this Opinion relates solely to safety and security expenses as they relate to the individual officeholder, not the officeholder's family, staff or other persons connected with the office or the officeholder.

It is therefore the official opinion of the Ethics Commission that:

Ordinary and necessary expenses incurred for safety and security measures to respond to dangers or threats posed to a state elected official as a direct result of holding elected state office fall within the definition of officeholder expenses, so long as (1) the safety and security expenses would not be incurred if the individual did not hold the elected office; (2) the dangers or threats posed to the state elected official are a direct result of and closely related to office held by that elected official; and (3) the expenses are reasonable.





➤ Public Comments

➤ Provided Written:

From: Kell Kelly <Kell.Kelly@okhouse.gov>

Sent: Wednesday, August 13, 2025 1:48 PM

To: LeeAnne Bruce Boone <LeeAnne.BruceBoone@ethics.ok.gov>

Subject: [EXTERNAL] Re: Advisory Opinion Request

Nice talking with you today. I generally find reasonableness in your Opinion. So, thank you. My only point would be that in certain circumstances, a bodyguard could fall within your definition. I would think that might need a special ruling/opinion/direction from the Ethics Commission.

➤ Oral Comments/Argument During Hearing



OKLAHOMA

Ethics Commission



Special Commission Meeting
August 14, 2025
OK State Capitol, Rm. G-3



Executive Session



OKLAHOMA

Ethics Commission



Special Commission Meeting
August 14, 2025
OK State Capitol, Rm. G-3



Currently in
Executive Session



OKLAHOMA

Ethics Commission



Special Commission Meeting
August 14, 2025
OK State Capitol, Rm. G-3



Returning Soon From
Executive Session



OKLAHOMA

Ethics Commission



Special Commission Meeting
August 14, 2025 11:00 AM
OK State Capitol, Rm. G-3

Complaint C-25-12

Complaint C-25-14

Complaint C-25-15

No action on:

**Case No. 2022-25 alleging violations of Ethics Rules 2,
Campaign Finance.**

**Case No. 2025-13 alleging violations of Ethics Rule 2,
Campaign Finance.**

**Case No. 2024-38 alleging violations of Ethics Rule 2,
Campaign Finance.**

**Case No. 2024-29 alleging violations of Ethics Rule 2,
Campaign Finance.**

Complaint C-25-16



OKLAHOMA
Ethics Commission



Adjournment



OKLAHOMA

Ethics Commission



Next Regularly Scheduled
Commission Meeting
September 11, 2025 @10:00 a.m.
OK State Capitol, Rm. G-3