



# OKLAHOMA

## Ethics Commission



Special Commission Meeting  
October 6, 2025 10:00 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 special meeting and executive session held September 11, 2025



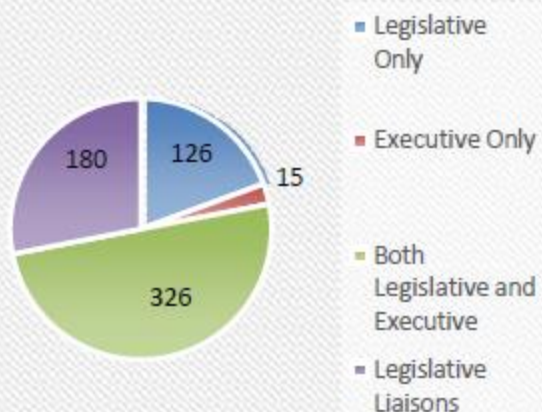
**Executive Director's Report**

# Compliance Update

## THE GUARDIAN SYSTEM REGISTRANTS

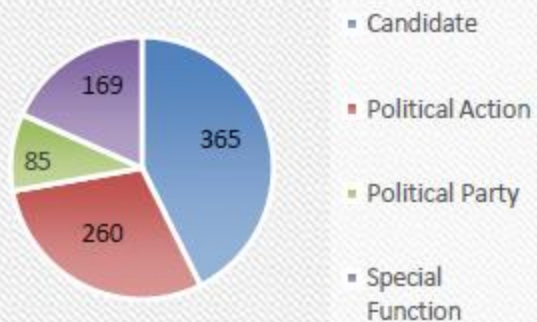
Active Filers as of October 1, 2025

### Lobbyists



**Total Lobbyists: 647**

### Committees



**Total Committees: 879**

**Total Lobbyists and Committees: 1,526**

## Upcoming Reporting Schedules

### Lobbyist/Liaison

Executive Only  
Lobbyist  
3<sup>rd</sup> Quarter –  
October 15, 2025

Executive Only  
Lobbyist  
4<sup>th</sup> Quarter –  
January 15, 2026

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

## Candidates & Non-Candidate Committees

2025 3<sup>rd</sup> Quarter Due  
October 31, 2025  
(Candidates and non-  
Candidate Committees)

2026 1<sup>st</sup> Quarter Due  
April 30, 2026  
(Candidates and non-  
Candidate Committees)

2025 4<sup>th</sup> Quarter Due  
January 31, 2026  
(Candidates and non-  
Candidate Committees)



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# Compliance Update

## Reporting Highlights

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

**96%** of expected Committee reports were timely filed

**100%** of expected Special Election reports

## Proposed/Final Compliance Orders

### Lobbyist/Liaison Compliance

0 Proposed Orders issued

0 Final Order issued

### Committee Compliance

0 Proposed Orders issued

7 Final Orders issued

## COMPLIANCE ACTIVITY TRACKER

DATE – SEPTEMBER 2025

### COMPLIANCE OFFICERS

CO#1

CO#2

CO#3

CO#4

# CANDIDATES/OFFICES  
ASSIGNED\*

89

85

93

90

# OTHER COMMITTEE  
TYPES/LOBBYISTS  
ASSIGNED

365

647

85

2

CALLS/WALK-INS

57

17

106

42

REPORTS REVIEWED

76

13

12

15

EMAIL CORRESPONDENCE

122

113

70

68

TOTALS

255

143

188

125

# Recent & Upcoming Trainings & Events

- State Election Board Fall Conference & Training - Political Subdivisions – Oklahoma State Election Board Association | Metro Tech | **9/30**
- 2025 Transportation Leadership Conference – Conflicts of Interest – Oklahoma Department of Transportation | NCED Conference Center & Hotel | **10/1**
- CLE on Ethics – Conflicts of Interest | DHS Attorneys | Oklahoma History Center | **10/10**
- OU Law School Legislative Seminar | **10/27**
- 2025 Oklahoma Certified Public Manager Cohort– Conflicts of Interest | **10/30**

# Budget

FY 2027 Incremental Funding Request #1

Agency Number & Name

296 Ethics Commission

Agency priority (#):

Brief Description of this Funding Change:

Political Subdivision Enforcement

(this is the "name" that will be used on the Summary to list this particular funding request)

Timeframe of this Funding Change:

1. Is this request recurring or one-time? (One-time requests can be funded over several years if necessary, but are not ongoing.)

Recurring

2. If the request is one-time, how many years will funds be needed? (Further details to be provided in the "Incremental & Supplemental Summary" tab.)

Justification for the Funding Change:

1. Please describe the funding change and what the agency intends to accomplish:

Agency requests recurring funding for political subdivision enforcement. For education and proactive compliance to be effective, the funding must be recurring and should increase. The # of entities Ethics manages is now predicted to be 4x the entities from years prior.

2. What are the short-term or long-term savings and/or cost effectiveness associated with this funding change?

Increased compliance and awareness of campaign finance at the local level.

3. Does this request require a statutory change? If yes, briefly describe the change below.

n/a

4. If this request is an enhancement to existing program(s) or support function(s), provide the following information.

If the existing program is specific to 7-digit department(s) instead of 2-digit division(s), list departmental information in the table below.

Name of Program or Support Function	Division Number(s)	Division Name(s)	Current Total Fiscal Year Budget for this Program (\$)	Prior Year Total Expenditures for this Program (\$)

5. If the purpose of this funding change is to address a mandate, specify whether it is a court ordered, state, or federal mandate, and include the appropriate legal reference and description.

a. Type of mandate:

b. Legal reference:

c. Description of mandate:

6. If the agency will use a KPM to track the success of the funding request, describe the goals and KPMs in the table below.

Goal of Funding Request	Key Progress Measure (KPM) Name	KPM Description
Inclusion of political subdivisions for campaign finance rule enforcement	Staggered implementation/implementation	tiered inclusion of political subdivisions/municipalities/schools and tech centers into compliance efforts and reporting software beginning November 1, 2025. Full

7. If the agency will not measure funding outcomes with KPMs, describe how and when the agency will evaluate progress or success.

8. Please provide a description of the potential clients served including the number to be served through this funding change.

547 political subdivisions, over 40 municipalities and over 500 independent schools/tech centers

9. Do any other state, federal or local agencies administer a similar or cooperating program? If so, which agencies?

n/a

10. Explain any proposed funding sources for this request aside from state appropriations, including federal or revolving funds (federal program providing matching funding; fee increases, local grants; etc.).

Funding Source (Federal, Revolving, Other)	Estimated Annual Amount of Funding (\$)	Description of Funding Source

FY 2027 Incremental Funding Request #2

Agency Number & Name

296 Ethics Commission

Agency priority (#):

Brief Description of this Funding Change:

Recurring annual licensing fees during stabilization of Guardian 2.0

(this is the "name" that will be used on the Summary to list this particular funding request)

Timeframe of this Funding Change:

1. Is this request recurring or one-time? (One-time requests can be funded over several years if necessary, but are not ongoing.)

Recurring

2. If the request is one-time, how many years will funds be needed? (Further details to be provided in the "Incremental & Supplemental Summary" tab.)

Justification for the Funding Change:

1. Please describe the funding change and what the agency intends to accomplish:

Licensing fees for Guardian 2.0 until stabilization period ends and State assumes ownership.

2. What are the short-term or long-term savings and/or cost effectiveness associated with this funding change?

State owns source code and will resume IT operations after system stabilization.

3. Does this request require a statutory change? If yes, briefly describe the change below.

n/a

4. If this request is an enhancement to existing program(s) or support function(s), provide the following information.

If the existing program is specific to 7-digit department(s) instead of 2-digit division(s), list departmental information in the table below.

Name of Program or Support Function	Division Number(s)	Division Name(s)	Current Total Fiscal Year Budget for this Program (\$)	Prior Year Total Expenditures for this Program (\$)

5. If the purpose of this funding change is to address a mandate, specify whether it is a court ordered, state, or federal mandate, and include the appropriate legal reference and description.

a. Type of mandate:

b. Legal reference:

c. Description of mandate:

6. If the agency will use a KPM to track the success of the funding request, describe the goals and KPMs in the table below.

Goal of Funding Request	Key Progress Measure (KPM) Name	KPM Description
Use and stabilization of Guardian 2.0	Increased Compliance	Compliance increase and utilization of diversion

7. If the agency will not measure funding outcomes with KPMs, describe how and when the agency will evaluate progress or success.

Usage of Guardian 2.0 without interruption during stabilization.

8. Please provide a description of the potential clients served including the number to be served through this funding change.

4 million Oklahomans - statewide reporting software to include state and political subdivision officers and candidates. Over 2500 individuals served directly.

9. Do any other state, federal or local agencies administer a similar or cooperating program? If so, which agencies?

n/a

10. Explain any proposed funding sources for this request aside from state appropriations, including federal or revolving funds (federal program providing matching funding; fee increases, local grants; etc.).

Funding Source (Federal, Revolving, Other)	Estimated Annual Amount of Funding (\$)	Description of Funding Source

# Legislative Update



# Guardian 2.0

## ➤GO-LIVE: Oct ??

- Legacy Guardian System Public Shut-Off: **September 19 @5PM**
  - RFD On-Site for first few weeks of *Go-Live*

## ➤On-Going RISKS

- **Conversion:** Substantial Progress from last month
- **System Functions**
- **Administrative Features**
- **Data Analytics** for Public Facing Reports

## ➤CONTINGENCY PLANS

- No Legacy System as of October 1.

# Guardian 2.0

➤ **Training:** Live/In-Person & Virtual through October

➤ TENTATIVE DATES:

- Wed, Oct ????? In-person
- Thursday, Oct 9 Zoom
- Monday Oct 13 or Tuesday Oct 14 Zoom
- Thursday, Oct 23 In-person
- Monday Oct 27 or Tuesday Oct 28 Zoom

➤ Guides Posted online: <https://oklahoma.gov/ethics/resources/guardian-v2>

➤ More Resources In Development



# Case Management Systems



## Features:

- Cloud Based
- Task Management
- Automated Workflows
- Comm. Hub (text, email, notes call)
- Outlook plug-in
- PDF Editor
- Deadline Chain Management
- Custom Report Builder
- Unlimited Storage
- Expense Tracker



## Features:

- Client Management
- Document Management
- Task Management
- Calendaring
- Time and Expense Tracking
- Outlook Plug-In
- Cloud Based
- Already has an ATO with OMES  
(Authority to Operate)
- Document Generation



## Features:

- Instant Access to Reports
- Aggregated Team Metrics
- Case Tracking
- Time Tracking
- Quick Search ORC Comprehensive
- Document Tracking
- Attachment Notifications
- Cloud Based
- No Implementation Service Fee



# Rules Working Groups

# Political Subdivision Update

**Local  
candidates.  
Statewide  
rules.**



**Curious about  
candidates'  
campaign  
finances?**



**The Ethics  
Commission  
is here to  
help.**



**Elected  
to office?**



**Running  
for office?**



# Political Subdivision Update



# Proposed Amendment to Rule 2.19

## **Rule 2.19. Cash Contributions.**

**No contribution of more than Fifty Dollars (\$50.00) in cash in the aggregate may be made to or accepted by a political party committee, a political action committee or a candidate committee.**





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## Executive Session





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Currently in  
Executive Session



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Returning Soon From  
Executive Session



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# **Case No. 2024-32 alleging violations of Ethics Rule 4, Conflict of Interest.**

# Complaint C-25-17

# Complaint C-25-18

# Complaint C-25-19

# Complaint C-25-20



# No action on:

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

**Case No. 2025-14 alleging violations of Ethics Rule 2, Campaign Finance. Case No. 2025-12 alleging violations of Ethics Rule 2, Campaign Finance.**



**OKLAHOMA**  
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Adjournment



# OKLAHOMA

## Ethics Commission



Next Regularly Scheduled  
Commission Meeting  
November 8, 2025 @10:00 a.m.  
OK State Capitol, Rm. G-3