



OKLAHOMA

Ethics Commission



Commission Meeting
September 11, 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 August 14, 2025

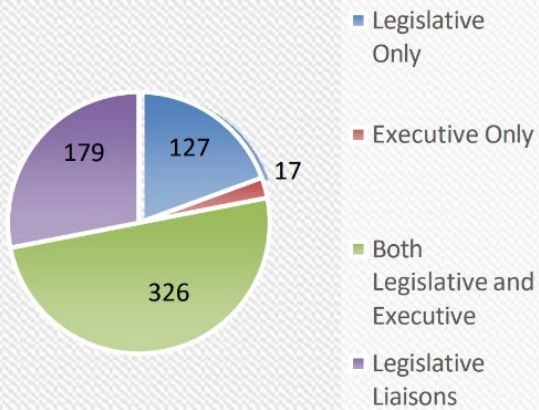


Executive Director's Report

Compliance Update

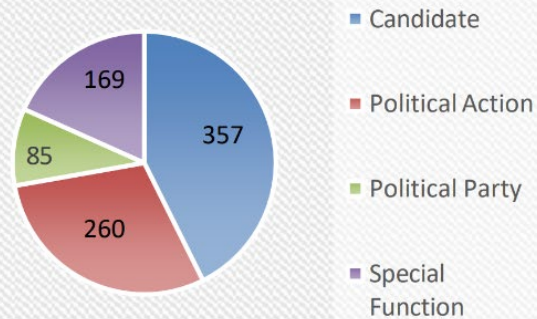
THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of July 1, 2025

Lobbyists



Total Lobbyists: 649

Committees



Total Committees: 871

Total Lobbyists and Committees: 1,520

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

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

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



OKLAHOMA
Ethics Commission

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

5 Final Order issued

Committee Compliance

24 Proposed Orders issued

0 Final Orders issued

COMPLIANCE ACTIVITY TRACKER				
DATE – AUGUST 2025				
	COMPLIANCE OFFICERS			
	CO#1	CO#2	CO#3	CO#4
# CANDIDATES/OFFICES ASSIGNED	51	45	58	46
CALLS/WALK-INS	47	32	88	41
REPORTS REVIEWED	11	75	27	67
EMAIL CORRESPONDENCE	131	76	42	39
TOTALS	189	183	157	147

Recent & Upcoming Trainings & Events

Conferences

- Education Leadership Conference – Oklahoma State School Board Association | **9/5 – 9/7**
- OML Expo & Training (9/10) – Oklahoma Municipal League | **9/10 – 9/11**
- State Election Board Fall Conference & Training - Political Subdivisions – Oklahoma State School Board Association | Metro Tech | **9/29**

Trainings

- Dept. of Commerce - Conflicts of Interest Training | **9/18**
- Oklahoma State School Board Association - Political Subdivisions | **9/22** (OKC)
- Oklahoma State School Board Association - Political Subdivisions | **9/24** (Owasso)
- Oklahoma State Regents - Update on Ethics Commission Rules | OU Norman Campus | **9/25**

As of September 3, 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	195 - General Appropriations									860,714.96
	19501	10	25	1,014,630.00	.00	.00	.00	1,014,630.00	.00	
	19502	10	26	1,014,630.00	.00	300.00	153,915.04	.00	860,414.96	
				2,029,260.00		300.00	153,915.04	1,014,630.00	860,414.96	
	200 - Revolving Fund									670,910.54
	20000	10	24	178,006.00	.00	41,501.74	.00	39,454.75	97,049.51	
	20000	10	25	277,481.00	.00	79,378.96	6,191.20	68,519.16	123,391.68	
	20000	10	26	72,722.00	.00	56,182.71	3,351.82	.00	13,187.47	
				528,209.00		177,063.41	9,543.02	107,973.91	233,628.66	
	210- Political Subdivisions									298,315.37
	21000	10	26	199,943.00	.00	149,500.00	1,684.63	.00	48,758.37	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				300,000.00		149,500.00	1,684.63		148,815.37	
	211 - Revolving Fund – Specifically for IT/Tech Related Expenses									421,215.70
	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	6,007.54	2,990.48	60,623.26	161,918.72	
	21100	88	26	151,544.00	.00	41,311.46	17,910.16	.00	92,322.38	
				548,770.00		51,314.66	20,900.64	136,752.82	339,801.88	
	212 - Guardian Replacement Fund									1,642,920.00
	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	501,009.45	3,820.00	.00	510,170.55	
				2,215,000.00		802,805.45	12,690.00	544,390.00	855,114.55	
	Grand Totals			6,459,196.00	-	1,180,983.52	273,733.33	2,566,703.73	2,437,775.42	3,894,076.57



Budget

Actuals as of September 3, 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	834,382	115,905.54	0.00	0.00	115,905.54	718,476.46	718,476.46	13.89	13.89
512 Insur.Prem-Hlth-Life,etc	147,054	147,054	11,445.96	1,500.00	0.00	12,945.96	134,108.04	134,108.04	8.80	8.80
513 FICA-Retirement Contributi	196,200	196,200	27,496.37	0.00	0.00	27,496.37	168,703.63	168,703.63	14.01	14.01
515 Professional Services	65,687	65,687	539.00	169,946.00	0.00	170,485.00	-104,798.00	-104,798.00	259.54	259.54
519 Inter/Intra Agy Pmt-Pers S	432	432	64.75	367.25	0.00	432.00	0.00	0.00	100.00	100.00
521 Travel - Reimbursements	14,600	14,600	751.80	0.00	0.00	751.80	13,848.20	13,848.20	5.15	5.15
522 Travel - Agency Direct Pmt	7,400	7,400	29.25	0.00	0.00	29.25	7,370.75	7,370.75	0.40	0.40
531 Misc. Administrative Expen	16,415	16,415	1,409.00	10,729.50	0.00	12,138.50	4,276.50	4,276.50	73.95	73.95
532 Rent Expense	700	700	0.00	609.78	0.00	609.78	90.22	90.22	87.11	87.11
533 Maintenance & Repair Expen	0	0	0.00	622.25	0.00	622.25	-622.25	-622.25	~	~
534 Specialized Sup & Mat.Expe	0	0	438.38	0.00	0.00	438.38	-438.38	-438.38	~	~
536 General Operating Expenses	5,900	5,900	871.44	0.00	0.00	871.44	5,028.56	5,028.56	14.77	14.77
552 Scholar.,Tuition,Incentive	25	25	0.00	0.00	0.00	0.00	25.00	25.00	0.00	0.00
601 AFP Encumbrances	0	0	0.00	22,207.93	0.00	22,207.93	-22,207.93	-22,207.93	~	~
810 Reg Only	0	0	0.00	162,299.80	0.00	162,299.80	-162,299.80	-162,299.80	~	~
	1,288,795	1,288,795	158,951.49	368,282.51	0.00	527,234.00	761,561.00	761,561.00	40.91	40.91
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19502 GRP Duties	1,014,630	1,014,630	153,915.04	300.00	0.00	154,215.04	860,414.96	860,414.96	15.20	15.20
19601 GRP-Duties	0	0	0.00	57.00	0.00	57.00	-57.00	-57.00	~	~
20000 Ok Coun Campaign, Eth Rev	72,722	72,722	3,351.82	218,425.51	0.00	221,777.33	-149,055.33	-149,055.33	304.97	304.97
21000 Political Subdiv Enforcemt	199,943	199,943	1,684.63	149,500.00	0.00	151,184.63	48,758.37	48,758.37	75.61	75.61
21100 Ethics Comm Online Filing	1,500	1,500	0.00	0.00	0.00	0.00	1,500.00	1,500.00	0.00	0.00
	1,288,795	1,288,795	158,951.49	368,282.51	0.00	527,234.00	761,561.00	761,561.00	40.91	40.91
Totals for Division 10	1,288,795	1,288,795	158,951.49	368,282.51	0.00	527,234.00	761,561.00	761,561.00	40.91	40.91



Budget

Actuals as of September 3, 2025

IS Services

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	71,062	12,183.60	0.00	0.00	12,183.60	58,878.40	58,878.40	17.15	17.15
512	Insur.Prem-Hlth-Life,etc	14,820	14,820	2,233.56	0.00	0.00	2,233.56	12,586.44	12,586.44	15.07	15.07
513	FICA-Retirement Contributi	17,524	17,524	2,907.28	0.00	0.00	2,907.28	14,616.72	14,616.72	16.59	16.59
515	Professional Services	742,561	742,561	3,820.00	522,499.17	0.00	526,319.17	216,241.83	216,241.83	70.88	70.88
531	Misc. Administrative Expen	296,434	296,434	585.72	11,002.92	0.00	11,588.64	284,845.36	284,845.36	3.91	3.91
532	Rent Expense	3,500	3,500	0.00	2,331.82	0.00	2,331.82	1,168.18	1,168.18	66.62	66.62
533	Maintenance & Repair Expen	117,100	117,100	0.00	6,073.00	0.00	6,073.00	111,027.00	111,027.00	5.19	5.19
536	General Operating Expenses	0	0	0.00	414.00	0.00	414.00	-414.00	-414.00	~	~
541	Office Furniture & Equipme	3,600	3,600	0.00	0.00	0.00	0.00	3,600.00	3,600.00	0.00	0.00
810	Req Only	0	0	0.00	1,500.00	12,819.90	14,319.90	-14,319.90	-14,319.90	~	~
		1,266,601	1,266,601	21,730.16	543,820.91	12,819.90	578,370.97	688,230.03	688,230.03	45.66	45.66
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	1,500.00	12,819.90	14,319.90	-14,319.90	-14,319.90	~	~
21000	Political Subdiv Enforcemt	100,057	100,057	0.00	0.00	0.00	0.00	100,057.00	100,057.00	0.00	0.00
21100	Ethics Comm Online Filing	151,544	151,544	17,910.16	41,311.46	0.00	59,221.62	92,322.38	92,322.38	39.08	39.08
21200	Ethics Com Fil Sys Replcmm	1,015,000	1,015,000	3,820.00	501,009.45	0.00	504,829.45	510,170.55	510,170.55	49.74	49.74
		1,266,601	1,266,601	21,730.16	543,820.91	12,819.90	578,370.97	688,230.03	688,230.03	45.66	45.66
Totals for Division 88		1,266,601	1,266,601	21,730.16	543,820.91	12,819.90	578,370.97	688,230.03	688,230.03	45.66	45.66
Totals for Bus Unit 29600		2,555,396	2,555,396	180,681.65	912,103.42	12,819.90	1,105,604.97	1,449,791.03	1,449,791.03	43.27	43.27

Guardian 2.0

➤ **GO-LIVE: Anticipating Week of Sept. 22**

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

➤ **On-Going RISKS**

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

➤ **CONTINGENCY PLANS**

- No Legacy System as of October 1. Need at least small transition with access to both systems administratively



Guardian 2.0

- **Open External Testing:** Monday, September 15
 - Open Testing opportunities available at-large. Must RSVP to **ethics@ethics.ok.gov** reserve a testing slot
- **Training:** Live/In-Person & Virtual through October
 - TENTATIVE DATES:
 - Wed, Oct 1 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
 - Training Material In Development (some drafts are online now)





Public Transparency

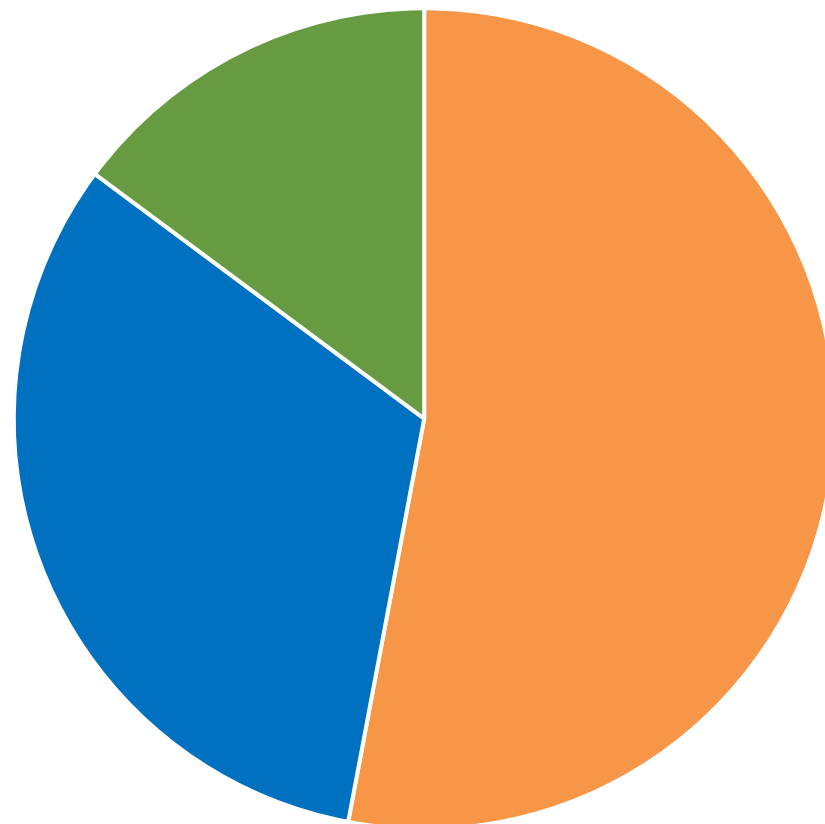
- Online Form Options & Efficiencies
- Confidential Complaints
- Open Records Request





Administrative Actions by OEC

Proposed Compliance Orders
236 total from 1/1/2025 thru 9/5/2025



■ Lobbyists
 ■ Candidates
 ■ PACs

236 Proposed Compliance Orders:

- **46** Open and Unpaid
- **18** Still Pending (Final order hasn't issued)
- **172** Closed

13 violators for 3x+ list –

- 3 lobbyists
 - 1 PAC
 - 3 Former State Legislators
 - 5 Unsuccessful Candidates
 - 1 Current Legislator
- Total of almost \$30,000 in unpaid fines from these 13 violators alone

**Late filing is most common violation*



Rules Working Groups



September 2, 2025

Dear **recipient's name**,

On behalf of the Oklahoma Ethics Commission, I am pleased to welcome you to the Advisory Group to the Oklahoma Ethics Commission. We are grateful for your willingness to serve in this important role.

The Advisory Group will serve as a bridge between the Commission and the public. While the group does not carry formal authority, it provides a vital opportunity for members of the regulated community to share their independent voice. Members will advise the Commission on matters such as rule review, strategic planning, and policy considerations.

Your participation will contribute to advancing the Commission's goals of transparency, balanced representation, and meaningful public involvement. Through this collaboration, we hope to foster dialogue that benefits both the Commission and the citizens of Oklahoma.

Our **first meeting is scheduled for [Insert Date in Early October]**. Additional details will be provided in advance.

Thank you for your commitment to public service and to strengthening trust in Oklahoma's ethical standards. We look forward to working with you.

Respectfully,

Lee Anne Bruce Boone, J.D.
Executive Director
Oklahoma Ethics Commission
leeanne.bruce.boone@ethics.ok.gov

Political Subdivision Update



The logo for the Oklahoma State School Boards Association (OSSBA), featuring the acronym 'OSSBA' in large blue letters with a stylized orange and blue graphic below it, and the text 'OKLAHOMA STATE SCHOOL BOARDS ASSOCIATION' underneath. The logo for the #OKLAED25 Education Leadership Conference, featuring a stylized '25' in blue and orange, with the text '#OKLAED25 Education Leadership Conference' and 'September 4-7, 2025 • Oklahoma City Convention Center' below it.	The logo for the Oklahoma Municipal League (OML), featuring the text 'OKLAHOMA MUNICIPAL LEAGUE' in bold blue letters with a red and white striped graphic, and the tagline 'The Unified Voice of Oklahoma Cities and Towns' below it. A circular logo for 'ALL SYSTEMS GO' with 'OML' in the center, surrounded by 'OKMRF' and 'OMAG', and 'OKC 2025' at the bottom.	The logo for the Oklahoma State Election Board, featuring a stylized multi-colored star graphic to the left of the text 'OKLAHOMA State Election Board'.
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New Filing Requirements for County Candidates & Officials

Starting **Nov. 1, 2025**, all county candidates and elected officials must file financial disclosures and campaign reports directly with the **Oklahoma Ethics Commission**, not county election boards.

WHAT'S CHANGING?

- **New Filing System** — Use Guardian 2.0 online platform (guardian.ok.gov) for all reports
- **Who's Affected?** — County Campaign Committees, Political Committees and elected officials
- **Effective Date** — Nov. 1, 2025*
**Until then, please continue filing with your County Election Board*



LEARN MORE & FILE ONLINE

Visit ethics.ok.gov for details and compliance steps with the Municipal Campaign Finance & Financial Disclosure Act.



**Rulemaking request submitted by
Ethics Commission Staff regarding the
90-day provision for surplus funds in AO
2019-01, Rules 2.48 and 2.116.**

Rulemaking request submitted by Ethics Commission Staff regarding the 90-day provision for surplus funds in AO 2019-01, Rules 2.48 and 2.116.



OKLAHOMA ETHICS COMMISSION

PHONE: (405) 521-3451 • FAX: (405) 521-4905 • WEBSITE: WWW.ETHICS.OK.GOV

Advisory Opinion 2019-01 (Cite as: 2019 OK Ethics 01)

Dear Ms. Hoskin:

We are responding to your advisory opinion request relating to Ethics Rule 2, establishing rules of ethical conduct for elective state office and for campaigns for state initiatives and referenda.¹ You ask, in effect, the following question:

Does Ethics Rule 2.48 extend by 90 days the mandatory dissolution date established by Ethics Rule 2.116 for an officeholder's candidate committee to dissolve?

Your question arises because Ethics Rule 2.116 establishes mandatory dissolution dates for candidate committees which occur *before* an officeholder's term expires, but Rule 2.44 specifically provides that an officeholder may make expenditures for officeholder expenses until the expiration of the term of office (or other vacation of office) and Rule 2.48 provides how surplus funds² may be expended *after* an officeholder's term expires.

Ethics Rule 2.116 provides, in pertinent part:

A candidate committee shall dissolve no later than two (2) years after the general election for an office with a two-year term, no later than four (4) years after the general election for an office with a four-year term, and no later than six (6) years after the general election for an office with a six-year term, if not required to dissolve sooner by law or these rules.

Rule 2.44 provides, in relevant part,

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.

Ethics Rule 2.48 provides, in pertinent part:

Any surplus funds remaining in the candidate committee's possession within ninety (90) days after the expiration of the term to which the candidate was elected or, for candidates who were not elected, within (90) days after the second year following the general election, shall be deposited in the general revenue fund of the state.

In effect, the Ethics Rules recognize five categories of expenditures for candidate committees: (1) ordinary and necessary campaign expenses; (2) operating expenses; (3) contributions to other candidate committees; (4) officeholder expenses; and (5) surplus funds.³

Construing the provisions of Ethics Rule 2 as a whole, giving effect to each of its provisions, Ethics Rule 2.116 establishes the mandatory dissolution dates for candidate committees.⁴ This date is the final date for authorized committee activity including receipt of contributions and expenditure of funds. However, if a committee does not dissolve and has funds remaining at the time of the mandatory dissolution date there must be options available to lawfully dispose of those remaining funds. For this reason, Rules 2.44 and 2.48 authorize two categories of expenditures to dispose of those funds. First, Rule 2.44 provides for expenditure of funds for officeholder responsibilities through the officeholder's last day in office. Second, Rule 2.48 permits disposal of campaign funds using the surplus funds expenditure options.

In effect this means the mandatory dissolution date in Rule 2.116 applies to a committee that does not have funds remaining in its depository account. For a committee with funds remaining in its depository account, the mandatory dissolution date in Rule 2.116 establishes the date to cease activity *other than* the activity contemplated in Rule 2.44 for officeholder expenses, and Rule 2.48 for disposal of surplus funds.

Accordingly, a candidate committee that does not have funds remaining in its depository account at the time of the mandatory dissolution date established in Rule 2.116 is required to dissolve and file a final report of contributions and expenditures no later than the mandatory dissolution date in Rule 2.116. However, a committee with funds remaining in its account at the time of the mandatory dissolution date established in Rule 2.116 must cease all activity other than the activity permitted in Rules 2.44 and 2.48 and is no longer able to accept contributions or make expenditures for contributions to other candidate committees, ordinary and necessary campaign expenses; or operating expenses.

Therefore, it is the official opinion of the Ethics Commission that:

1. **Ethics Rule 2.116 establishes the mandatory dissolution dates for candidate committees.**
2. **Candidate committees that have no funds remaining in the committee's campaign depository are required to dissolve and file a final report by the mandatory dissolution date.**
3. **Candidate committees with funds remaining in the committee's campaign depository on the mandatory dissolution date established in Rule 2.116 may no longer receive contributions or make expenditures for contributions to other candidate committees, campaign expenses, or operating expenses.**
4. **Candidate committees with funds remaining in the committee's campaign depository on the mandatory dissolution date established in Rule 2.116 may**
 - a. **for elected officers, (1) make expenditures for officeholder expenses until the officeholder's term of office is completed or the office is vacated; and (2) make expenditures for surplus funds as provided for in Rule 2.48 for ninety (90) days after the officeholder's term is completed or vacated; or**
 - b. **for unelected candidates, make expenditures for surplus funds as provided for in Rule 2.48 for ninety (90) days after the second year following the general election for which the committee was formed.**
5. **After the ninety (90) day timeframe has ended the only option for expenditure of remaining funds in a candidate committee's depository account is payment to the state's general revenue fund.**

¹ Ethics Rule 2.1.

² "Surplus funds of a candidate committee are those funds not otherwise obligated following the election at which the office for which the candidate committee was formed has been determined which, in the candidate's discretion, are not required to be used for campaign expenses or officeholder expenses." Ethics Rule 2.48.

³ Ethics Rules 2.43, 2.44, and Rule 2.48.

⁴ Dissolution of a candidate committee includes *both* (1) closing the candidate committee's depository account, and (2) filing a final contributions and expenditure report in The Guardian System, the Commission's electronic filing system.

Rulemaking request submitted by Ethics Commission Staff regarding the 90-day provision for surplus funds in AO 2019-01, Rules 2.48 and 2.116.

Rule 2.48. Candidate Committee Surplus Funds.

Surplus funds of a candidate committee are those funds not otherwise obligated following the election at which the office for which the candidate committee was formed has been determined which, in the candidate's discretion, are not required to be used for campaign expenses or officeholder expenses. Such surplus funds may be:

- (A) Retained in any amount for use in a future campaign for the next succeeding term for the same office;
- (B) Retained for a future campaign for a different state elective office, excluding a judicial office;
- (C) Donated to a charitable organization as described in Section 501(c) (3) of Title 26 of the United States Code as it currently exists or as it may be amended;
- (D) Returned to any contributor, as long as the amount returned does not exceed the contributor's aggregate contribution during the immediately preceding primary, runoff primary and general elections;
- (E) Contributed to a political party committee in any amount not to exceed Twenty-five Thousand Dollars (\$25,000.00) in the aggregate;
- (F) Used to purchase item(s) for donation to a charitable organization as described in Section 501(c)(3) of Title 26 of the United States Code as it currently exists or as it may be amended; provided:
 - 1) the donated item(s) are sold by the charitable organization for fundraising purposes;
 - 2) the purchase of the item(s) for donation is reported on a Contributions and Expenditures Report which includes a description and cost of the item(s) purchased;
 - 3) the donation of the item(s) is reported on a Contributions and Expenditures Report as an in-kind expenditure to the charitable organization which includes a description and the value of the item(s) donated; and
 - 4) the donated item(s) may not be purchased or used by the candidate whose committee is donating the item, any other candidate, a committee, or officer, board member or employee of the charitable organization; or
- (G) Donated in accordance with the provisions of Title 60 O.S. § 381, et seq., to the State of Oklahoma, or, to any county, city, town or school district within the State of Oklahoma.

Any surplus funds remaining in the candidate committee's possession within ninety (90) days after the expiration of the term to which the candidate was elected or, for candidates who were not elected, within ninety (90) days after the second year following the general election, shall be deposited in the general revenue fund of the state.

Commission Comment

A candidate cannot determine the existence of surplus funds until after the election for which the funds were received. For that reason, this Rule cannot be applied until after the election. A candidate may continue to use campaign funds for campaign purposes and officeholder expenses and still determine that some funds are "surplus funds" and thus available for use as provided in this Rule.

The rule allows for surplus funds to be returned to a contributor up to the amount contributed, but this does not include contributions from the candidate. Contributions cannot be returned to the candidate unless the candidate executed a written loan document with the committee at the time of the loan, and deposited the funds from the loan into the committee's depository at the time of the loan. See also Rule 2.67, prohibiting repayment to a candidate except in the case of a properly documented loan to the candidate committee. This Rule also provides that surplus funds remaining in the candidate committee's possession ninety (90) days after the expiration of the term to which the candidate was elected are forfeited to the State. For candidates who are not elected, the ninety (90) day period begins two years after the general election.



Rulemaking request submitted by Ethics Commission Staff regarding the 90-day provision for surplus funds in AO 2019-01, Rules 2.48 and 2.116.

Rule 2.116. Dissolution of Candidate Committee.

A candidate committee may dissolve at any time by filing a Final Report of Contributions and Expenditures that shows no funds remaining in the committee. A candidate committee shall dissolve no later than two (2) years after the general election for an office with a two-year term, no later than four (4) years after the general election for an office with a four-year term, and no later than six (6) years after the general election for an office with a six-year term, if not required to dissolve sooner by law or these Rules.

Commission Comment

Candidate committees may file a final report and dissolve only when there are no funds remaining in the committee.

Candidate committees are required to terminate their existence by a date certain. Candidates, including candidates losing an election, have a continuing duty to timely submit Reports of Contributions and Expenditures, even if the candidate committee has no activity, until the candidate committee is dissolved to the satisfaction of the Commission and a Final Report of Contributions and Expenditures is filed. See, also, Rule 2.48 for candidates who are not elected.

The mandatory time frames for dissolution of candidate committees are based on the term of office for the office that the candidate serves. This ensures the timely dissolution of candidate committees and levels the playing field for successful candidates and unsuccessful candidates. The committee may dissolve after resolving any debt. See Rule 2.117.

Advisory Opinion 2019-01: *A candidate committee without funds remaining in its campaign depository must dissolve by the specified mandatory dissolution date as established in Rule 2.116. However, a candidate committee with funds remaining in its campaign depository on the specified mandatory dissolution date as established in Rule 2.116 are, from the mandatory dissolution date and on, no longer permitted to (1) receive contributions, (2) contribute to other candidate committees, (3) make campaign expenditures, or (4) make operating expenditures. However, such committees may make the following expenditures:*

- a. Candidate committees of **elected officers** may make expenditures (1) for officeholder expenses until his/her term expires or the office is vacated and (2) of surplus funds as provided for in Rule 2.48 for ninety (90) days after the officeholder's term is completed or vacated; or*
- b. Candidate committees of **unelected candidates** may make expenditures of surplus funds as provided for in Rule 2.48 for ninety (90) days after the second year following the general election for which the committee was formed.*

After the ninety (90) day period has ended, any remaining funds must be deposited in the state's general revenue fund.

Rulemaking request submitted by Ethics Commission Staff regarding the 90-day provision for surplus funds in AO 2019-01, Rules 2.48 and 2.116.

Rule 2.78. Exploratory Activities.

An individual may conduct exploratory activities, such as polling and other techniques designed exclusively to assist the individual in making a decision as to whether to seek any state office or offices. The individual may accept contributions, subject to the limits in these Rules, and make expenditures limited to exploratory activities without designating a candidate committee; provided, however, the individual shall keep or cause to be kept all records required of a candidate committee. Provided further, once an individual has accepted or expended more than Twenty-five Thousand Dollars (\$25,000.00) for exploratory activities for a statewide office or Ten Thousand Dollars (\$10,000.00) for any other state office, the individual either shall become a candidate and file a Statement of Organization as required by these Rules, or cease all exploratory activities. If the individual becomes a candidate and forms a candidate committee, all contributions received and expenditures made for exploratory activities shall be subject to maximum contribution limits and shall be included in the committee's first Report of Contributions and Expenditures. No individual may conduct exploratory activities for a state office or offices as provided in this section more than one time between regular general elections for state offices.

Commission Comment

In some situations, individuals wish to “test the waters” for a political campaign and, after doing so, decide not to seek an office. This Rule permits those who engage in such exploratory activities to do so without having to file a Statement of Organization with the Commission, provided they comply with the requirements of the Rule.

Essentially, candidates engaging in exploratory activities keep the same records as the Rules require for candidate committees. Furthermore, the limits that apply to candidate committees apply to exploratory activities.

If, after conducting exploratory activities, the individual decides not to become a candidate for the office, there is no requirement to file a Statement of Organization.

The Rule prohibits the use of an exploratory committee by any individual more than once between general elections for state offices that are held in November of even-numbered years.

Advisory Opinion Request No. 2025-03

Regarding whether a candidate committee must open a new bank account when the candidate is running for a subsequent term for the same office.

➤ **Hearing for AOR 2025-03 to be held on November 13, 2025, if directed**



Advisory Opinion Request 2025-03

Representative Judd Strom
House District 10
State Capitol Building
2300 N. Lincoln Blvd., Room 455.1
Oklahoma City, OK 73105
Office 405-557-7402
Judd.Strom@okhouse.gov



*House of Representatives
State of Oklahoma*

September 9, 2025

Oklahoma Ethics Commission
2300 N. Lincoln Blvd. G27
Oklahoma City, OK 73105

I am requesting an advisory opinion on the matter below;

Could you please provide some clarity to the rule regarding bank accounts for candidate contribution holdings?

I have understood the rule to mean that with each election cycle, a candidate/officeholder would be asked to 'zero-sum' or close out their current bank account, create a new account, and transfer any carry-over funds to that new account. I understand that some do not.

I have found the action to be cumbersome, be confusing, and possibly lead to the unintended consequence of observers being misled by the transfer of funds.

I would appreciate some clarity to the rule.

Yours,

A handwritten signature in black ink, appearing to be "J. Strom", written over a faint circular stamp.

Representative Judd Strom
State of Oklahoma
House District 10

Chairman:
Appropriations and Budget General
Government

Committees
Appropriations and Budget
General Government
Government Oversight
Joint Committee Appropriations and
Budget
Conference Committee on
Government Oversight
GCCA

➤ **Hearing for AOR 2025-03 to
be held November 13, 2025, if
directed**



OKLAHOMA
Ethics Commission



OKLAHOMA

Ethics Commission



Commission Meeting
September 11, 2025
OK State Capitol, Rm. G-3



Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
September 11, 2025
OK State Capitol, Rm. G-3



Currently in
Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
September 11, 2025
OK State Capitol, Rm. G-3



Returning Soon From
Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
September 11, 2025 10:00 AM
OK State Capitol, Rm. G-3

**Case No. 2022-25 alleging violations
of Campaign Finance Ethics Rule 2;
State of Oklahoma ex rel.
Oklahoma Ethics Commission v.
Pittman, Oklahoma County District
Court, Case No. CJ-2025-_____**

Case No. 2024-5 alleging violations of Ethics Rules 2 and 3, Campaign Finance and Financial Disclosure

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

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

Complaint C-25-16

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
Ethics Commission



New Business



Adjournment



OKLAHOMA

Ethics Commission



Next Regularly Scheduled
Commission Meeting
October 9, 2025 @10:00 a.m.
OK State Capitol, Rm. G-3