



OKLAHOMA

Ethics Commission



Commission Meeting
March 13, 2025
10:00 AM

Executive Director's Report

The "**Compliance Activity Tracker**" has been established for each member of our compliance team and will be reported monthly. Tracing the number of callers/walk-in clients, reports reviewed and email correspondence, OEC will be in a better position to demonstrate its commitment to its mission and meeting clients where they are to help each achieve compliance. Nearly 400 reports were reviewed by only 2 staff members in December 2024-January 2025. Of note is that our 3^a Compliance Officer Number is still in the early stages of training and limited in scope and availability of work at this point in development.

In addition, we anticipate utilizing this tracker as an educational tool and to inform leadership in the development of a Frequently Asked Questions section for publication on the OEC website by Fall 2025.

COMPLIANCE ACTIVITY TRACKER			
DATE			
DECEMBER 2024- JANUARY 2025			
	COMPLIANCE OFFICERS		
	<u>CO #1</u>	<u>CO #2</u>	<u>CO #3</u>
# CANDIDATES ASSIGNED	95	95	93
CALLS/ WALK-INS	124	97	135
REPORTS REVIEWED	130	244	0
EMAIL CORRESP	230	406	18
TOTALS	579	842	246



Ethics Commission: Operational Assessment

Summary of Policy Considerations and Agency Recommendations

The Legislature may consider the following policy changes:

- Modify statute of limitations to prohibit the Ethics Commission from reviewing filings from a previous election cycle except for in cases of fraud.
- Require that campaign banking documents be submitted to the Ethics Commission after the election.

The Ethics Commission should:

For improved operational efficiency:

- Implement a case management system to allow for the tracking of agency resources and outcomes.
- Develop a schedule for reviewing campaign finance filings to ensure that every filing is reviewed for inconsistencies as it is received. This may require reducing the frequency of filings.

To better detect and deter the most serious violations:

- Create a risk-based audit schedule that examines winning campaigns most frequently, but also audits a random selection of other campaigns.
- Require campaigns to turn over banking records for the campaign account to the Ethics Commission after the general election and when the campaign committee is dissolved.

To promote public trust and make the Commission's processes more transparent:

- Create an annual report that makes public the metrics of the agency and the value added to the state of Oklahoma.
- Increase training offerings and educational guidance by including on the agency's public-facing website, including:
 - Recorded training presentations
 - A list of frequently asked questions and answers
 - A list of the agency's prior responses to requests for informal guidance
 - A schedule of in-person trainings
- Update the Ethics Rules to require a Notice of Allegations to accompany any subpoena.
- Create a uniform policy with clear criteria for making a complaint or investigation public prior to final resolution of the case.
- Avoid opening formal investigations into elected officials during the regular four-month Legislative Session; this would not preclude the routine review or audit of a campaign's financial records. This would be analogous to the speech or debate clause of the Oklahoma Constitution.

Budget



<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									150,000.00
	19102	10	25	75,000.00	.00	.00	.00	.00	75,000.00	
	19102	88	25	75,000.00	.00	.00	.00	.00	75,000.00	
				150,000.00					150,000.00	
	193									0.00
	19301	10	23	684,313.00	.00	.00	.00	684,313.00	.00	
	19301	88	23	3,644.00	.00	.00	.00	3,644.00	.00	
				687,957.00				687,957.00		
	194									0.00
	19401	10	24	684,433.00	.00	.00	113,190.59	571,242.41	.00	
	19401	88	24	3,524.00	.00	.00	782.95	2,741.05	.00	
				687,957.00			113,973.54	573,983.46		
	195									185,046.63
	19501	10	25	1,014,630.00	.00	12,673.45	491,377.37	.00	510,579.18	
				1,014,630.00		12,673.45	491,377.37		510,579.18	
	200									656,679.31
	20000	10	23	358,488.00	.00	100,377.22	.00	76,842.15	181,268.63	
	20000	10	24	178,006.00	.00	41,501.74	(9,217.28)	48,672.03	97,049.51	
	20000	10	25	103,238.00	.00	22,337.52	70,657.50	.00	10,242.98	
				639,732.00		164,216.48	61,440.22	125,514.18	288,561.12	
	211									319,501.15
	21100	88	23	190,580.00	.00	7,745.02	.00	171,735.42	11,099.56	

Legislative

Advisory Opinion Requests

Outstanding/Pending

Informal Opinions

- **AOR-2020-05:** Ethical Issues related to collaboration related to education for state employers
- **AOR-2020-03 & AOR-2020-02:** Does "Solicitation" definition include items purchased for a raffle by an Affiliated Association for benefit of PAC
 - Formal requests no longer applicable to requestors.
- **AOR-2020-01:** Rules and requirements for 3rd parties connecting contributors to candidates
- **AOR-2016-01:** Time restriction and clarification sought on contributions to political parties and how associated activities/expenditures fit within the definition of campaign expenses or officeholder expenses.

Staff Memorandums

- **AOR-2019-02:** Are virtual, digital, or crypto currencies considered "anything of value" under current statute and ethics rules?

Guardian System

OK Ethics

Kickoff Deliverable

- Kickoff Meeting
- Develop Project Charter with objecti...
- Confirm Azure AD integration requir...
- Identify stakeholders and their respo...
- Outline initial setup for cloud hosting...
- Ensure dependencies for data migrat...
- Kickoff Deliverable Approved

Requirements Gathering Deliverab...

- Confirm requirements for compliance...
- Document detailed requirements for:...
- Specify public-facing functionality for...
- Define encryption requirements for ...
- Validate system's role-based permiss...
- Establish performance monitoring too...
- Requirements Deliverable Approved

Design Deliverable

- Present mockups or prototypes for in...
- Deliver architecture design to suppor...
- Define and present API structures for...
- Validate technical requirements for ...
- Define audit trail storage and retriev...
- Design Deliverable Approved

UAT Deliverable

- Deliver the fully configured system in...
- Ensure data migration is completed f...
- Conduct usability testing for public-f...
- UAT Complete

Data Migration Deliverable

- Migrate last five years of historical d...
- Validate migrated data with test quer...
- Include metadata and audit trails as ...
- Data Conversion Approved

21%

100%

100%

100%

100%

100%

100%

100%

100%

99%

100%

100%

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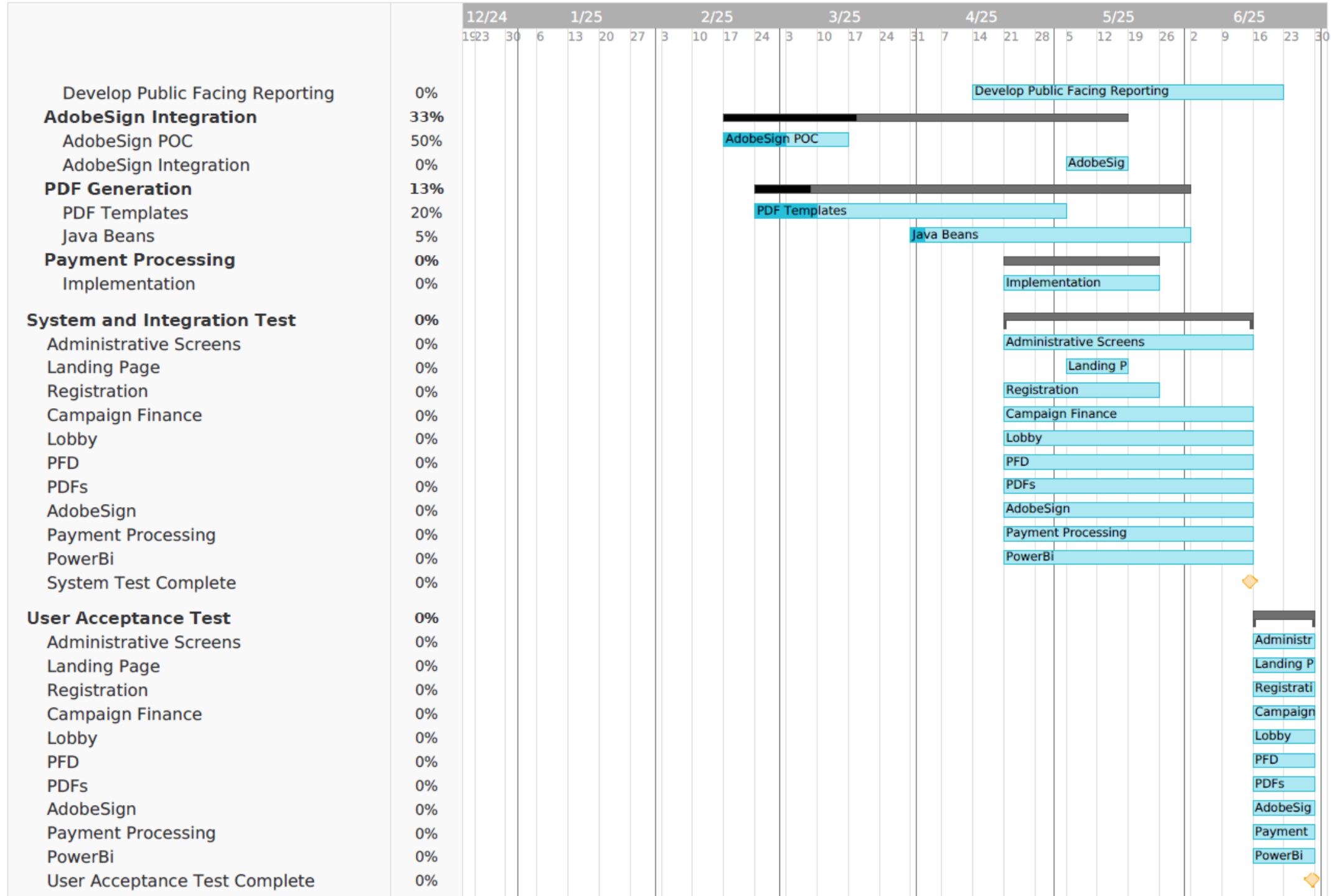
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Track political advertising and activity and make research available via an industry-neutral online software platform (SaaS). Services provided to media firms, agencies, platforms, etc.

- Advertisement tracking conducted on Radio, TV, connected TV/Streaming Devices, & Digital
 - Includes all national broadcasters, 80+ cable networks, 1,100 local broadcasters, 36,500+ digital advertisers and publishers, and extensive Connected TV/Over the Top(OTT) streaming.
 - TV accounts for 22+ million households in all 210 Designated Market Areas (DMAs)
- Captures device-level activity and conducts comprehensive spending analysis including monitoring millions of airings a day. For example:
 - Over the Air/Cable Broadcast Media Sellers report directly to Adimpact
 - Adimpact verifies through FEC
 - Connected TV or CTV (i.e., smart/stream devices)
 - Digital: Google, X, META/Facebook self-report activity in 3 different areas
 - Pulled together on Adimpact's end for the user

Access detailed tracking of political expenditures for Oklahoma across campaigns, cycles, and races, with granular data down to TV or radio station spending.

Includes Candidate, PAC, Coordinated and Independent Expenditures by race. Detailed spending by advertising medium separated by week.

Tulsa Mayor 2024 1/1/2024 - 12/31/2024

\$274,361
 \$668,488

Advertiser
By Order, select an advertisement

Spots for Tulsa Mayor: 119,785

Partners Corp: \$64,576

Methods for Tulsa Mayor: \$11,838

Vendors for Tulsa Mayor: \$11,838

Spending Advantage
By Order Top GMA's, select an column

Breakdown Spend: \$274,361

Cable Spend: \$36,985

Radio Spend: \$

Satellite Spend: \$24,952

Digital Spend: \$10,101

CTV Spend: \$74,251

Top GMA's
To view spend into media types, select the "+"

Tulsa, OK: GOP: \$175,407; DEM: \$175,407

Desktop/Mobile: DEM: \$19,101

Satellite: GOP: \$24,952

Oklahoma City, OK: DEM: \$1,342

Sherman, TX - Ads, OK: DEM: \$1,047

Sherman, TX - Ads, OK: DEM: \$666

Tulsa Mayor 2024 1/1/2024 - 12/31/2024

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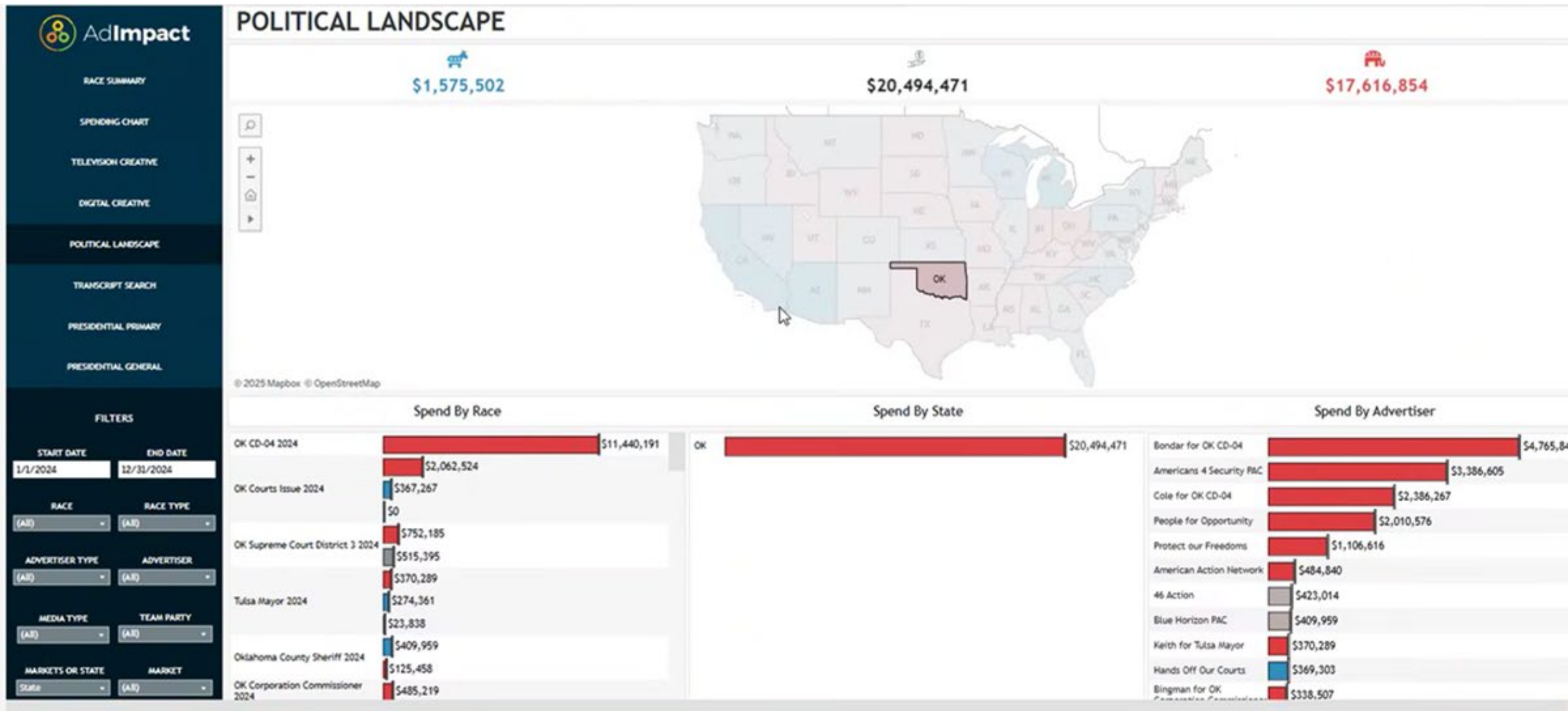
Sherman, TX - Ads, OK: DEM: \$1,047

Sherman, TX - Ads, OK: DEM: \$666



AdImpact

SaaS platform designed to analyze data across linear and streaming at the local level. Provides market share by advertiser, network, station, app, and DMA.



RACE SUMMARY

SPENDING CHART

TELEVISION CREATIVE

DIGITAL CREATIVE

POLITICAL LANDSCAPE

TRANSCRIPT SEARCH

PRESIDENTIAL PRIMARY

PRESIDENTIAL GENERAL

FILTERS

START DATE

END DATE

1/1/2024

12/31/2024

RACE

ELECTION

OK CD-04 2024

(All)

ADVERTISER TYPE

ADVERTISER

(All)

(All)

TEAM PARTY

MEDIA TYPE

(All)

(All)

SPENDING / GRPS

Spending

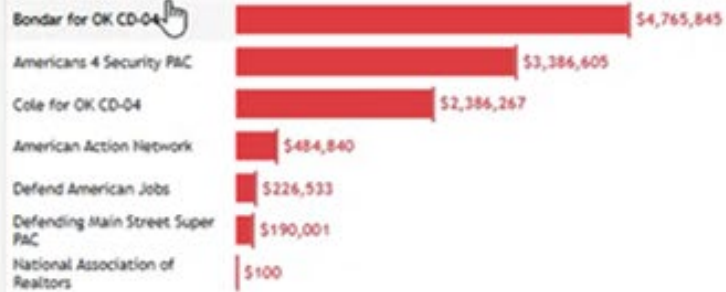


\$11,440,191

\$11,440,191

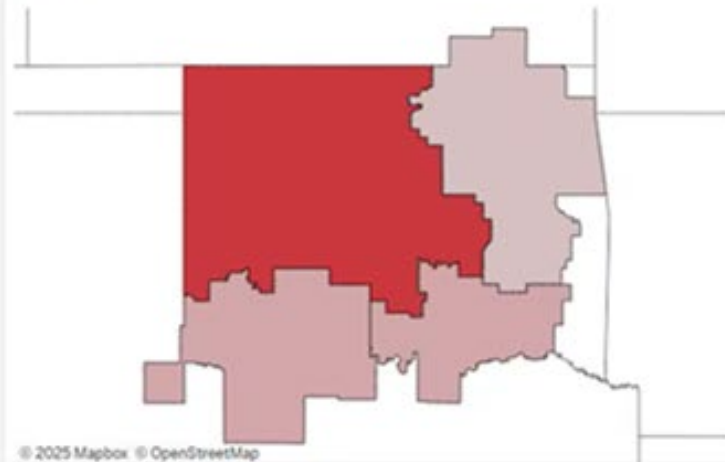
Advertiser

To filter, select an advertiser.



Spending Advantage

To filter Top DMAs, select an area.



© 2025 Mapbox © OpenStreetMap

Top DMAs

To drill down into media type, select the "+"

Oklahoma City, OK	GOP	\$3,043,189	\$4,335,631
Wichita Falls, TX - Lawton, OK	GOP	\$1,231,000	
Sherman, TX - Ada, OK	GOP		
Desktop/Mobile	GOP		
Tulsa, OK	GOP		
Non Metro	GOP		
Satellite	GOP	\$20,000	

Spending Over Time

Select metric to see relevant results

Party Spending

Spend Advantage





RACE SUMMARY

SPENDING CHART

TELEVISION CREATIVE

DIGITAL CREATIVE

POLITICAL LANDSCAPE

TRANSCRIPT SEARCH

PRESIDENTIAL PRIMARY

PRESIDENTIAL GENERAL

FILTERS

START DATE

END DATE

1/1/2024

12/31/2024

RACE

ELECTION

OK SD-25 2024

OK SD-25 2024 PRL...

ADVERTISER

MEDIA TYPE

(All)

Broadcast

MARKET

Tulsa, OK

er (Unverified) vs CTV

OK SD-25 2024 1/1/2024 - 12/31/2024

The OK SD-25 2024 race saw 4 distinct ads across 3 DMAs

Television advertisements

Select an ad to filter, select "Go to Ad" to view ad in web browser

Spending
Recent
Airs

▲ TONE

Positive

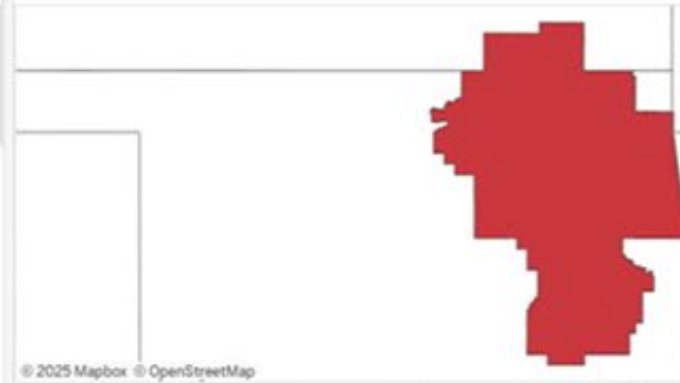
Contrast

▼ Negative

Boatman for OK SD-25	Running	6/12	6/18
Boatman for OK SD-25	Stands With Our Heroes	6/11	6/18
Guthrie for OK SD-25	The Truth	6/15	6/18

Ad Frequency by Market

Click on a Market to filter



© 2025 Mapbox © OpenStreetMap

Ad Rotation

To view Rotation by Creative, select +/- first, then use the dropdown to select Rotation by Creative

% Breakdown

Rotation by Market

Expand View

		click +/- to expan..
		Tulsa, OK
Boatman for OK SD-25	Running	100%
	Stands With Our Heroes	100%
Guthrie for OK SD-25	The Truth	100%

Powerful & Easy Analysis Tools

Filter and export data, across races, advertisers or time periods to easily compare to contributions or reported advertisers.

One-click export to PowerPoint, PDF, Excel or export image files of charts and graphs.

FILTERS

START DATE

1/10/2024

END DATE

12/31/2024

RACE

(All)

RACE TYPE

(All)

ADVERTISER TYPE

(All)

ADVERTISER

(All)

MEDIA TYPE

(All)

TEAM PARTY

(All)

MARKETS OR STATE

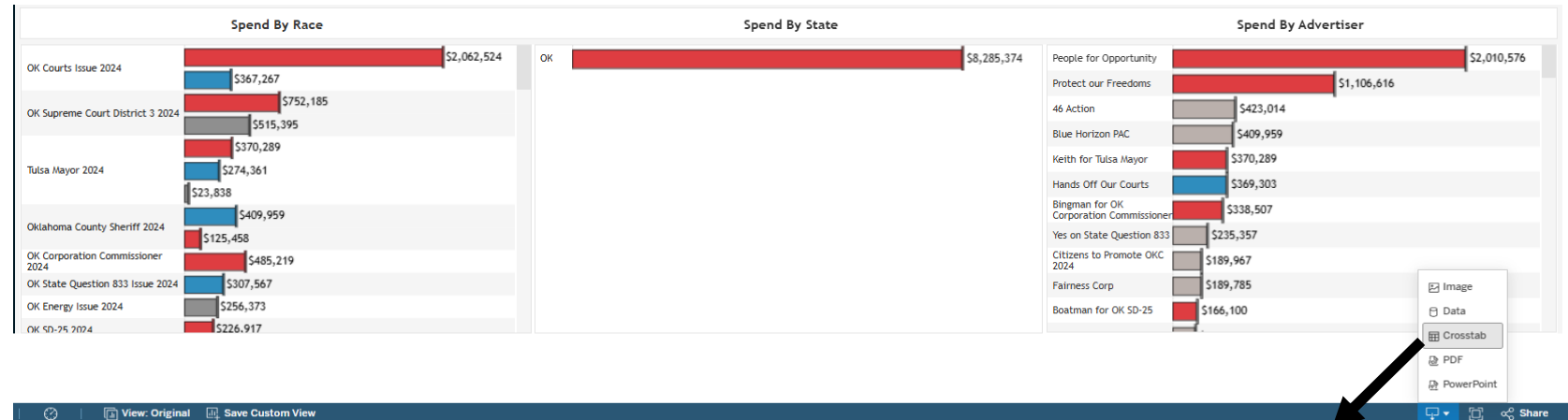
State

MARKET

(All)

Filters Include:

- **Date:** Back to 2018
- **Race:** Federal, State and Local, including Ballot Measures.
- **Race Type:** Down Ballot, Governor, House, Presidential, Senate
- **Advertiser Type:** Candidate, Coordinated, Issue Group
- **Media Type:** Broadcast, Cable, CTV, Digital, Radio, Satellite
- **Advertiser:** Named Candidates and Independent Expenditures
- **Team Party:** Democrat or Republican
- **Market or State:** All 210 Media Markets available



Advertiser	Party	Broadcast Spend	CTV Spend	Cable Spend	Digital Spend	Radio Spend	SPEND
People for Opportunity	Republican	583,030	728,617	354,473	79,598	67,115	\$2,010,576
Protect our Freedoms	Republican	444,530	502,209	89,977	69,900		\$1,106,616
46 Action	Independent	372,040		50,974			\$423,014
Blue Horizon PAC	Independent	395,850	484			13,625	\$409,959
Keith for Tulsa Mayor	Republican	224,000	74,251	36,985	10,101		\$370,289
Hands Off Our Courts	Democrat	334,891			2,036	32,376	\$369,303
Bingman for OK Corporation Commissioner	Republican	240,000	8,572	89,935			\$338,507
Yes on State Question 833	Independent	178,645	56,712				\$235,357
Citizens to Promote OKC 2024	Independent	83,410	106,557				\$189,967
Fairness Corp	Independent	162,630	12,155		15,000		\$189,785
Boatman for OK SD-25	Republican	10,843	151,235	4,022			\$166,100
Oklahoma Growth Alliance	Independent	45,385	89,376	14,850			\$149,611
Wallace for OK HD-32	Republican	71,840	20,874	51,180			\$143,894
Alliance for Secure Energy	Republican	104,935	36,669	662	80		\$142,346
Johnson for Oklahoma County Sheriff	Republican	105,660	19,798				\$125,458

RACE SUMMARY

SPENDING CHART

TELEVISION CREATIVE

DIGITAL CREATIVE

POLITICAL LANDSCAPE

TRANSCRIPT SEARCH

PRESIDENTIAL PRIMARY

PRESIDENTIAL GENERAL

FILTERS

START DATE

END DATE

1/1/2024

12/31/2024

RACE

ELECTION

OK SD-25 2024

OK SD-25 2024 PRL

TEAM PARTY

MARKET

[All]

[All]

ADVERTISER TYPE

ADVERTISER

[All]

[All]

MEDIA TYPE

LANGUAGE

[All]

[All]

RADIO FORMAT

[All]

\$226,917

\$226,917

				Grand Total		CTV inP	May 21, 2024		CTV inP	May 28, 2024		CTV inP	June 04, 2024	
				SPEND	GRF's		SPEND	GRF's		SPEND	GRF's		SPEND	GRF's
Boutman for OK SD-25	Tulsa, OK	Broadcast	KJRH	\$2,950	35									
			KQCI	\$3,995	47									
			KQCH	\$1,080	12									
			KTUL	\$2,818	33									
	Oklahoma City, OK	CTV	Cox Media/Tulsa P.L.	\$4,022										
			Device										\$366	
			In-App										\$2,343	
			Streaming										\$2,129	
			Device										\$24,453	
			In-App										\$139	
Senate Majority Fund	Tulsa, OK	CTV	Device										\$109	
			In-App										\$1,074	
			Streaming										\$77	
			Device										\$273	
	Oklahoma City, OK	CTV	In-App							\$48	870		\$4,795	
			Streaming							\$914	16,610		\$119	
			Device							\$22	402		\$5	
			In-App										\$163	
			Streaming							\$14	247		\$1	
			Device							\$421			\$1,014	
Guthrie for OK SD-25	Tulsa, OK	Broadcast	KJRH	\$4,735	56					\$204			\$1,264	
			KQCI	\$245	3									
			KQCH	\$1,250	15									
			KTUL	\$633										
	Oklahoma City, OK	CTV	Device	\$938		15,138							\$49	
			In-App	\$8,415		17,047							\$78	
			Streaming	\$102		152,002							\$421	
			Device	\$95		1,863							\$4	
			In-App	\$602		1,727							\$7	
			Streaming	\$47		14,591							\$19	

Download Crosstab

Select a sheet from this dashboard



Classic Spending Chart_SC

GOP Total Spend_SC

Select Format

☒ Excel ☐ CSV

Download

FileHomeInsertPage LayoutFormulasDataReviewViewAutomateHelp

Paste

Trebuchet MS9A⁺A⁻

BBIU

Font Color

Background Color

Align Left

Align Center

Align Right

Justify

Wrap Text

Merge & Center

Number

Custom

Conditional Formatting

Format as Table

Cell Styles

Insert

Delete

Format

AutoSum

Fill

Clear

Sort & Filter

Find & Select

Sensitivity

Add-ins

Analyze Data

ClipboardFontAlignmentNumberStylesCellsEditingSensitivityAdd-ins

O13		1074.3																			



ADMO

Advocacy & Government
Election Advertisements

CUSTOM RANGE 9/1/24 - 12/31/24

GROUP BY: ELECTION

SORT: MOST RECENT

OK Child Care Issue 2024

ads



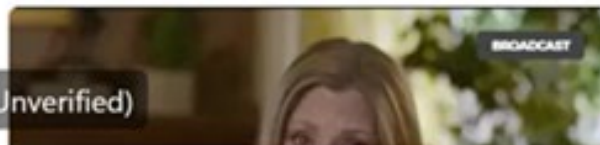
Congratulate Congressman Tom Cole :10
FIRST FIVE ACTION



Tragic Circumstances :15
RESCUE CLAYTON

OK SD-47 2024 General

ads



AdImpact

AD ALERT: OKLAHOMA STATE MEDICAL ASSOCIATION



Dr. Diane Heaton
Physician

SPOT TITLE
It's Life Threatening

FIRST TIME AIRING
5:52 AM

SPOT LENGTH
30

FIRST AIRING DATE
March 11, 2025

ADVERTISER
Oklahoma State Medical
Association

FIRST AIRING MARKET
Oklahoma City, OK

ELECTION
OK Healthcare Issue 2026

FIRST AIRING STATION
KWTV (CBS)

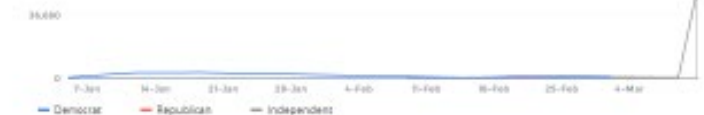
SPEND IN ELECTION

BY PARTY

Democrat: \$9,532
Independent: \$54,401
Republican: \$62

TOTAL
\$63,995

Spending by Team Party in OK Healthcare Issue 2026 Election



Analyze Messaging

Review all ads in one easy to navigate platform to check for proper disclaimers.

Filter database by Advertiser, Issue, Target, Tone, etc. Search all transcripts for key words.

Easily Export or Share Video Files

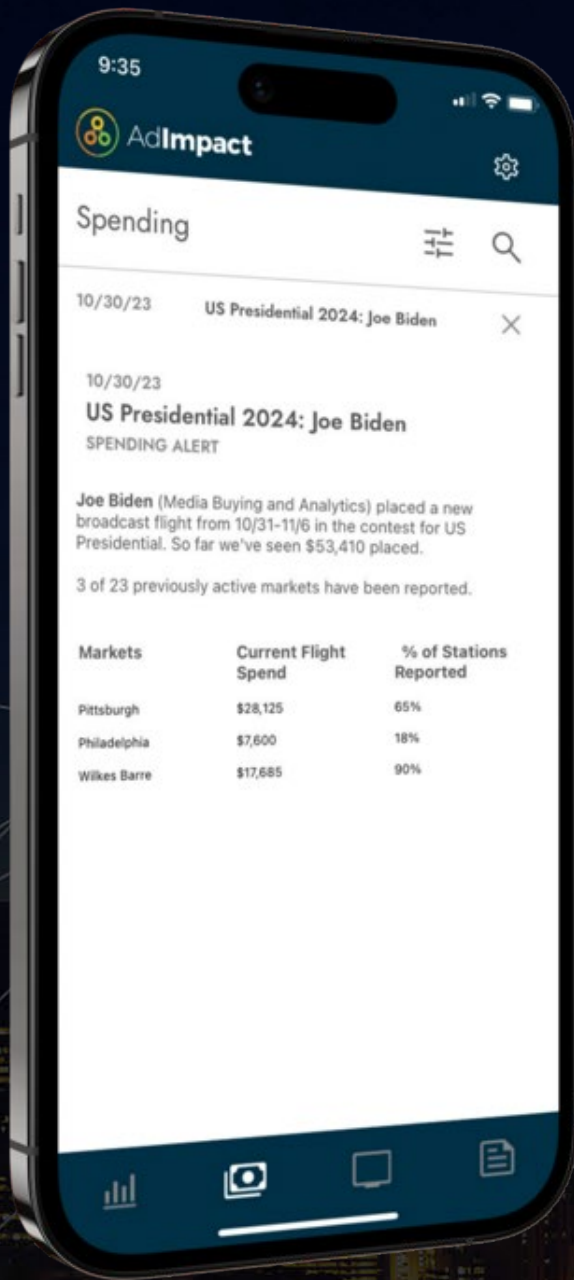
Broadcast, digital video, and CTV in one place.

Click the ad for additional detail including impressions, spending and total airings by market and media type.

Real-time logs are updated within minutes of a spot's airing.

The screenshot displays the ADMO platform interface, which is used for analyzing advertising messages. The top navigation bar includes the ADMO logo and a search bar. The main content area is divided into several sections:

- Filters:** A sidebar on the right allows users to filter ads by various criteria, including Broadcast, Digital, CTV, Contains National, Digital Source, Creative Type, Advertiser, Advertiser Party, Advertiser Type, OK, Oklahoma, Election, Market, Target, Tone, Issue, Spot Length, Transcription Search, Face ID, and Language.
- Ad List:** A grid of ad thumbnails is shown, each with a title and a duration. The ads include "Remove Liberals :30", "Vote Yes :30", "Sheriff Tommie Johnson III: Post Focus On Fighting Crime", "CRIME SCORECARD", "Lost Focus :30", and "At Large :30".
- Ad Detail View:** A large section on the right provides detailed information about a selected ad. It includes the ad's title, duration, and a description. Below this, there is a table showing the "TOP 5 MARKETS (BROADCAST)" with columns for Market, Spots, and Impressions. The table lists markets such as Oklahoma City, OK, Tulsa, OK, Wichita Falls, TX - Lawton, OK, Sherman, TX - Ada, OK, and New York, NY.
- Line Chart:** A line chart at the bottom right shows the "SPOTS OVER TIME" for the selected ad, with a blue line representing the data.



Download our new Mobile App!

On the road? The **AdImpact App** will put the power of our data in the palm of your hand!

- **Spending and creative insights** at your fingertips
- **Customize push notifications** for the races you care about most



Contribution Limits

Contribution limits for 2025–2026

		Recipient				
		Candidate committee	PAC† (SSF and nonconnected)	Party committee: state/district/ local	Party committee: national	Additional national party committee accounts‡
Donor	Individual	\$3,500* per election	\$5,000 per year	\$10,000 per year (combined)	\$44,300* per year	\$132,900* per year
	Candidate committee	\$2,000 per election	\$5,000 per year	Unlimited transfers	Unlimited transfers	
	PAC: multicandidate	\$5,000 per election	\$5,000 per year	\$5,000 per year (combined)	\$15,000 per year	\$45,000 per year
	PAC: non-multicandidate	\$3,500* per election	\$5,000 per year	\$10,000 per year (combined)	\$44,300* per year	\$132,900* per year
	Party committee: state/district/local	\$5,000 per election	\$5,000 per year	Unlimited transfers	Unlimited transfers	
	Party committee: national	\$5,000 per election**	\$5,000 per year	Unlimited transfers	Unlimited transfers	

* Indexed for inflation in odd-numbered years.

†”PAC” here refers to a committee that makes contributions to other federal political committees. Independent expenditure- only political committees (sometimes called “Super PACs”) may accept unlimited contributions, including from corporations and labor organizations.

‡ The limits in this column apply to a national party committee’s accounts for: (i) the presidential nominating convention; (ii) election recounts and contests and other legal proceedings; and (iii) national party headquarters buildings. A party’s national committee, Senate campaign committee and House campaign committee are each considered separate national party committees with separate limits. Only a national party committee, not the parties’ national congressional campaign committees, may have an account for the presidential nominating convention.

**Additionally, a national party committee and its Senatorial campaign committee may contribute up to \$62,000 combined per campaign to each Senate candidate. 110.2(e).



For further information, please contact:
Federal Election Commission
Washington, DC 20463
(800) 424-9530; (202) 694-1100
info@fec.gov

2024 State Elections: Contribution Chart

CONTRIBUTORS	RECEIVING COMMITTEES				
	State Candidate Committee	Limited Committee	1/25 Committee	Party Committee	Unlimited Committee
Individuals** (candidates may give unlimited contributions to their own campaign)	Per Election Limit*: \$3,300	\$5,000 per year	\$5,000 per year	\$10,000 per year (may be split between multiple party committees)	No Limits
	Unopposed Candidates: \$3,300 per campaign				
Limited Committee (other than 1/25 committees)	Per Election Limit*: \$5,000	\$5,000 per year***	Nothing	\$10,000 per year (may be split between multiple party committees)	Nothing
	Unopposed Candidates: \$5,000 per campaign				
1/25 Limited Committee	Per Election Limit*: \$2,500	Nothing	Nothing	\$5,000 per year (may be split between multiple party committees)	Nothing
	Unopposed Candidates: \$2,500 per campaign				
State Candidate Committee	\$3,300 per campaign (from 2024 committee to 2024 committee)	Nothing	Nothing	Up to \$25,000, only after the race is decided for that candidate	Nothing
Political Party	Statewide Office: \$25,000 prior to general election	Nothing	Nothing	Unlimited transfers between committees in same party	Nothing
	All Other State Offices: \$10,000 prior to general election				
Unlimited Committee	Nothing	Nothing	Nothing	Nothing	Unlimited***
Corporations	Nothing	Nothing	Nothing	Nothing	Unlimited
*PER ELECTION LIMITS Contribution limits are election specific with limits resetting after each election <i>only if</i> the candidate's name will appear on another ballot during the election cycle. A contributor may not provide one contribution to be allocated for multiple elections. After the general election, contributors may make additional contributions so long as the overall total given by the contributor does not exceed the amount of a single election limit for that contributor type.					
**CASH & ANONYMOUS CONTRIBUTIONS: No more than \$50 of a contributor's contribution may be in cash or from an anonymous source. Cash or anonymous contributions received in excess of \$50 must either be returned to the contributor (if known) or given to the State Treasurer's office to the general revenue fund of the state of Oklahoma.					
**TRIBES: Contributions from tribes are acceptable, as long as the tribe is not incorporated; tribes follow the individual contribution limit of \$3,300 per election.					
***COMMITTEE TYPE & PURPOSE: A PAC may only contribute to another PAC of the same type and with the same purpose.					

Attorney General Opinion

Rule 4.5. Misuse of Authority.

A state officer or employee shall not use or permit the use of his or her office or title or any authority associated with his or her state office, or a state office to which he or she has been elected, in a manner that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to himself or herself or to his or her family members or persons with whom the state officer or employee is affiliated in a nongovernmental capacity, except to the extent otherwise permitted or authorized by the Constitution or statutes or by these Rules.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Commission Comment

This Rule is intended to prevent a state officer or employee from using, directing or enticing third parties to use the state officer or employee's public position to improperly enrich the state officer or employee or others.

Example: *Ferguson, who has been elected to a statewide office but has not yet taken the office, may not offer or threaten "special treatment" for someone that he will regulate as a state officer, depending on whether that person will provide employment or other financial benefits to his spouse.*

Example: *Owens, the head of a state agency, may not permit Finch, her deputy director, to suggest to a representative of Ajax Corporation that "my boss" (Owens) would really enjoy a weekend at the Ajax Corporation resort in Florida.*

Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
March 13, 2025
10:00 AM

**Case No. 2024-03 alleging violations
of Ethics Rule 2, Campaign Finance.**

**Case No. 2024-37 combined with
2023-27, alleging violations of
Ethics Rule 2, Campaign Finance.**

**Case No. 2022-26 alleging violations
of Ethics Rule 2, Campaign Finance.**

**Case No. 2022-38 alleging violations
of Ethics Rule 2, Campaign Finance.**

**Case No. 2022-43 alleging violations
of Ethics Rule 2, Campaign Finance.**

**Case No. 2022-12 alleging violations
of Ethics Rule 2, Campaign Finance.**

**Case Nos. 2023-10 combined with
2024-35, alleging violation of Ethics
Rule 5, Lobbyist Registration and
Reporting.**

Complaint C-25-02

Complaint C-25-01

Complaint C-24-39

Complaint C-24-40

Complaint C-24-25