



OKLAHOMA

Ethics Commission



Commission Meeting
May 1, 2025
10:00 AM
OK State Capitol, Rm. G-3



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

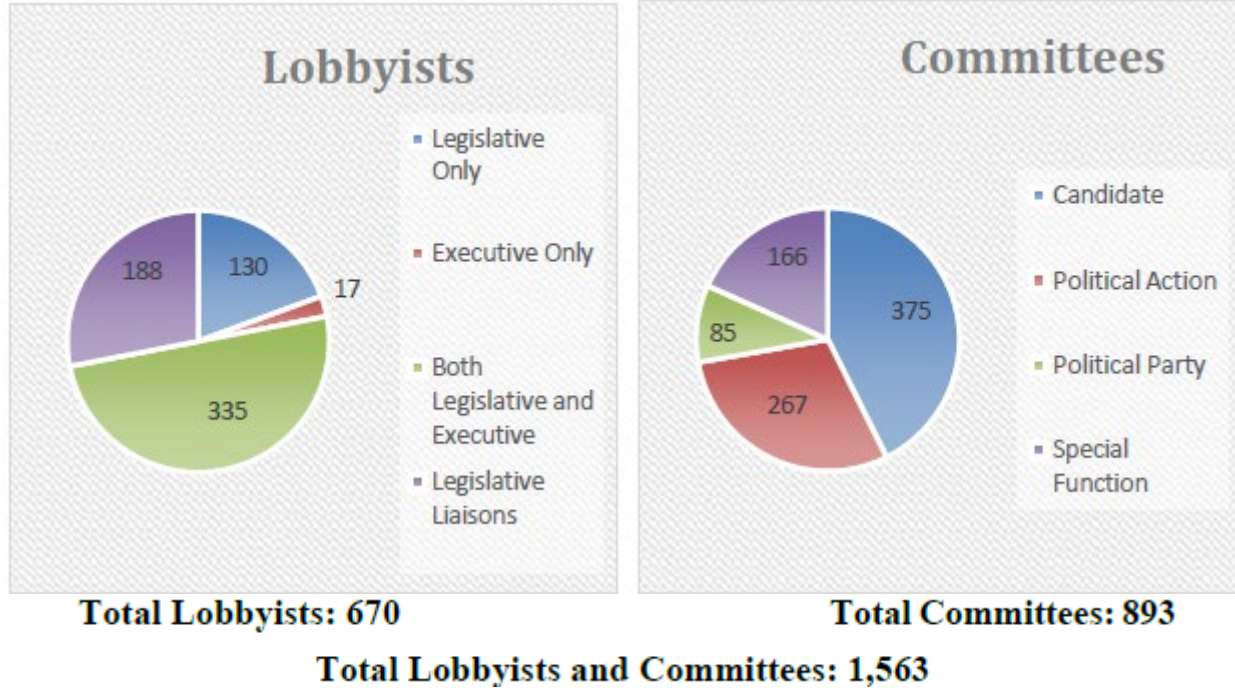


Consideration, discussion, and possible action on minutes for the regular meeting and executive session held April 10, 2025

Executive Director's Report

Compliance Update

THE GUARDIAN SYSTEM REGISTRANTS - Active Filers as of April 25, 2025



Upcoming **schedule** for lobbyist/liaison reports

Legislative
Lobbyist/Liaison
2025 April - May
5, 2025

Legislative
Lobbyist/Liaison
2025 June - July
15, 2025

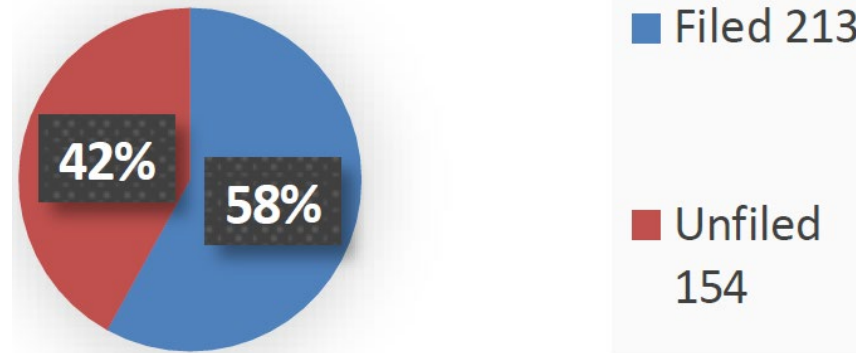
Legislative
Lobbyist/Liaison
2025 May - June
5, 2025

Executive Only
Lobbyist
2nd Quarter - July
15, 2025

COMPLIANCE ACTIVITY TRACKER			
DATE – April 2025 to date			
	COMPLIANCE OFFICERS		
	CO#1	CO#2	CO#3
# CANDIDATES/OFFICES ASSIGNED	95	95	93
CALLS/WALK-INS	36	34	61
REPORTS REVIEWED	71	185	12
EMAIL CORRESPONDENCE	137	97	23
TOTALS	244	316	96

Compliance Update

PERSONAL FINANCIAL DISCLOSURE (PFD) COMPLIANCE



Calendar Year 2024 Annual Filing for Elected Officials and Governor Appointed Cabinet & Agency Directors is due between:

January 1, 2025, and May 15, 2025

Legislative Update



Budget



Subcommittee	Agency Request	House	Senate
General Government			
Ethics Comm'n			
. FY-2025 Appropriation	\$2,364,630	\$2,364,630	\$2,364,630
. (s) Funding removal - Political Subdivisions	\$0	(\$150,000)	(\$150,000)
. Full Implementation of Software Solution	\$1,000,000	\$1,000,000	\$0
. Funding removal - Guardian System replacement	\$0	(\$1,200,000)	(\$1,200,000)
. Political Subdivision Enforcement	\$300,000	\$300,000	\$0
. FY-2026 Appropriation Requested	\$3,664,630	\$2,314,630	\$1,014,630

Budget Transparency Portal – House of Representatives

<https://former.okhouse.gov/fiscal/FiscalPortal.aspx>



Guardian 2.0 Update

Design Deliverable	83%	1/20/2025 - 3/3/2025
Present mockups or prototypes for interfaces (internal/external) and tooltips/contextual help for public-facing reports.	100%	1/20/2025 - 3/3/2025
Deliver architecture design to support scalability, fault tolerance, and elastic scaling.	100%	2/20/2025 - 3/3/2025
Define and present API structures for secure integrations and data exchange.	100%	2/26/2025 - 3/3/2025
Validate technical requirements for automated compliance tracking and advanced reporting tools.	100%	2/10/2025 - 3/3/2025
Define audit trail storage and retrieval processes in the system design.	100%	2/22/2025 - 3/3/2025
Design Deliverable Approved	0%	3/3/2025

Data Migration Deliverable	13%	3/20/2025 - 6/23/2025
Migrate last five years of historical data with schema mapping and data cleansing.	15%	3/20/2025 - 6/23/2025
Validate migrated data with test queries to ensure accuracy and accessibility.	10%	3/20/2025 - 6/23/2025
Include metadata and audit trails as part of the migration process.	25%	3/20/2025 - 6/23/2025
Data Conversion Approved	0%	6/23/2025

Design and Architecture	76%	1/13/2025 - 6/9/2025
Initial Database Design	100%	1/13/2025 - 3/3/2025
Iterative Database Design Changes	80%	3/3/2025 - 6/9/2025
User Interface Design	95%	1/13/2025 - 3/31/2025
Services Design	80%	1/13/2025 - 4/28/2025
Power BI Design	0%	3/31/2025 - 4/28/2025
Payment Processing	100%	3/31/2025 - 4/21/2025
Development and Unit Test	56%	1/19/2025 - 6/23/2025
User Interface	0%	1/19/2025 - 5/19/2025
Administrative Screens	75%	1/19/2025 - 5/3/2025
Landing Page	90%	2/17/2025 - 3/3/2025
Registration	90%	2/3/2025 - 3/17/2025
Campaign Finance	80%	2/3/2025 - 5/19/2025
Lobby	35%	2/24/2025 - 5/19/2025
PFD	25%	3/24/2025 - 5/19/2025
Services	31%	2/24/2025 - 5/19/2025
Administrative Screens	10%	2/24/2025 - 5/19/2025
Registration	95%	3/28/2025 - 5/19/2025
Campaign Finance	50%	3/10/2025 - 5/19/2025
Lobby	0%	3/10/2025 - 5/19/2025
PFD	0%	4/10/2025 - 5/19/2025
Power BI	0%	4/14/2025 - 6/23/2025
Develop Public Facing Reporting	0%	4/14/2025 - 6/23/2025

Adobe Sign Integration	88%	2/17/2025 - 5/19/2025
Adobesign POC	100%	2/17/2025 - 3/17/2025
Adobe Sign Integration	75%	5/05/2025 - 5/19/2025
PDF Generation	60%	2/24/2025 - 6/02/2025
PDF Templates	90%	2/24/2025 - 5/5/2025
Java Beans	30%	3/31/2025 - 6/2/2025
Payment Processing	70%	4/21/2025 - 5/26/2025
Implementation	70%	4/21/2025 - 5/26/2025
System and Integration Test	7%	4/14/2025 - 6/16/2025
Administrative Screens	0%	4/14/2025 - 6/16/2025
Landing Page	50%	5/5/2025 - 5/19/2025
Registration	25%	4/14/2025 - 05/26/2025
Campaign Finance	0%	4/14/2025 - 6/16/2025
Lobby	0%	4/14/2025 - 6/16/2025
PFD	0%	4/14/2025 - 6/16/2025
PDFs	0%	4/14/2025 - 6/16/2025
Adobe Sign	0%	4/14/2025 - 6/16/2025
Payment Processing	0%	4/14/2025 - 6/16/2025
Power BI	0%	4/14/2025 - 6/16/2025
System Test Complete	0%	6/16/2025
User Acceptance Test	0%	6/16/2025 - 6/30/2025

- All **Power BI** items are the highest risk items in terms of completeness at go live
- **Yellow** due to late start, but RFD does not believe the completion date is at risk at this time

Guardian 2.0 Update



OKLAHOMA
Ethics Commission





Policy Considerations and Agency Recommendations


➤ Avoid opening formal investigations into elected officials during the regular four-month Legislative Session.

➤ Actionable Strategic Plan

Strategic Plan

Promote Public Trust

Create an annual report that makes public the metrics of the agency and the value added to the state of Oklahoma. *December 2025*

Create a uniform policy with clear criteria for making a complaint or investigation public prior to final resolution of the case. *April 2025* 

Create an advisory group for the OEC for strategic advice, routine feedback and recommendations to the Commission. Seek volunteers to include candidates, officeholders, state officers and/or state employees willing to serve as part of a 2-year term for quarterly meetings to address concerns and needs of OEC. Result of improved satisfaction and effectiveness of OEC. *October 2025*

Strategic Plan

Operational Efficiencies

Implement a case management system to allow for the tracking of agency resources and outcomes. *May 2026*

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. Create a risk-based audit schedule that examines winning campaigns most frequently but also audits a random selection of other campaigns. *October 2025*

Strategic Plan

Operational Efficiencies

Implement Guardian System 2.0 *July 2025*


Establish full scale Diversion Program after pilot program's conclusion. Will reduce compliance fees/fines and create a proactive approach to compliance. First-time offenders and other broad categories will be prioritized, and the ability to utilize new software reporting system for automated notification (rather than offline creation of program) will assist in full-scale implementation. Maintain records of completion for diversion program and establish data points to determine effectiveness. *December 2025*

Strategic Plan

Detect and Deter (Education and Compliance)

Develop Strategy and Inclusion of Political Subdivisions for Enforcement and Education beginning Fall 2025. OEC will prioritize, assess and support key regional and local contacts for staggered implementation plan. 100% inclusion over 1–3-year staggered period with compliance reporting percentages to improve annually. *October 2025*

Increase training offerings and educational guidance, also included on the agency's public-facing website (*Spring 2026*):

- 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 



Attorney General Opinion Number 2025-05

QUESTION

Are state officers and employees subject to the jurisdiction of the Ethics Commission after leaving their office or position with the State for acts or omissions that occurred while they were state officers or employees, up to the time limit for enforcement?



Attorney General

Opinion Number 2025-05

DISCUSSION

Article XXIX, section 4 of the Oklahoma Constitution grants the Commission broad jurisdiction to investigate potential ethics rules violations and prosecute violators of those rules when appropriate, regardless of whether the state officer or employee leaves his or her employment after committing the ethical violation.

The ability to investigate and authorize prosecutions of former state officials and employees is also implied from the express grant of authority to the Commission in article XXIX, sections 3 and 4 of the Oklahoma Constitution.





Attorney General Opinion Number 2025-05

OPINION

State officers and employees are subject to the jurisdiction of the Ethics Commission even after leaving their office or position with the State for acts or omissions that occurred while they were a state officer or employee, up to the time limit for enforcement.



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Executive Session

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

Case No. 2024-33 combined with 2024-34 alleging violations of Ethics Rule 4, Conflicts of Interest

Case No. 2024-32 alleging violations of Ethics Rule 4, Conflicts of Interest.

Complaint C-25-04

Complaint C-25-07



OKLAHOMA

Ethics Commission



Next Regularly Scheduled
Commission Meeting
June 12, 2025, @10:00 a.m.
OK State Capitol, Rm. G-3



Cancelled: Regular Meeting
May 8, 2025