OKLAHOMA ETHICS COMMISSION
September 10, 2026
Regular Meeting

1. **Call to Order.**

Chair Meek ["Meek"] called to order the meeting of the Ethics Commission of the State of Oklahoma ["Commission"] on Thursday, September 10, 2026, at 10:00 am. in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma, after confirming the agenda and notice were properly given.

Determination of Quorum.

Roll was called to determine the existence of a quorum. Commissioners present were Joe Lucas ["Lucas"], Mike Wilt ["Wilt"], Vice Chair Adam Weintraub ["Weintraub"] and Chair Justin Meek ["Meek"]. A quorum of members was declared.

Staff & Visitors.

Commission staff members present were Executive Director Lee Anne Bruce Boone ["Bruce Boone"], Deputy Director Jeremy Rogers ["Rogers"], General Counsel Margaret Kerr ["Kerr"], Compliance Officer Tyler Fixley, and Compliance Specialist Aniston Emory.

Observing all or part of the meeting: David Oakley, Media; Steve Metzer, Media; Lionel Ramos, Media; H.J. Reed, OKSPA; Denise Lawson, Attorney; Joseph Pierce, Senate; Cullen Sweeney, Attorney General's Office; Maria Hayerty and Remington Dean, Governor's Office; Andrea Hancock, Media; Alex Gladden, Media; and Nolan Clay, Media.

1. **Open Meeting Act Compliance.**

Chair Meek reviewed the *Affidavit of Posting* and affirmed compliance with the Oklahoma Open Meeting Act.

2. **Introductions and Announcements.**

[Bruce Boone] No announcements.

3. **Announcements, consideration, discussion and possible action on the disqualification or recusal of Commissioner(s) pursuant to Ethics Rule 1.6 for any matter listed on the Commission agenda.**

No additional recusals.

4. **Consideration, discussion, and possible action on minutes for the regular meeting and executive session held August 13, 2026. [Chair Meek].**

Motion: Commissioner Wilt moved to approve the minutes for the regular meeting and executive session held on August 13, 2026.

Second: Commissioner Weintraub

Roll Call Vote: Wilt – yes, Weintraub– yes, Meek – yes, Lucas – Abstain

Motion Carried

5. **Executive Director's Report**

   a. **Budget Report**
   Executive Director Bruce Boone reported that while still early in the FY2027 fiscal year, the Commission spending is tracking as it's supposed to without any unexpected expenses with primary budget in personnel expenses.

   b. **Compliance and Education Report**
   There was one campaign reporting deadline for the Pre-Run Off Report in August with 88% reporting compliance rate. Active Filers in the Guardian continues to grow. Bruce Boone highlighted the more than 1,000 different public interactions, an increase of over 200 from the prior month. There was a slight decrease in report reviews, due in part to the natural cycle of filings and when Reports are due. Upcoming October Reports for Committees and Executive Lobbyist will create another concentrated workload. Brief update provided on upcoming education schedule reflecting several different audiences.

   c. **Guardian and Political Subdivision Update**
   There is a large increase in the amount of Personal Financial Disclosures (PFD) that must be reported at the Political Subdivision level. Not only are the actual elected officials at the political subdivision level required to file PFDs, but political subdivision candidates also have to file PFDs. Due to the system differences, Political Subdivision Candidates will file PFDs in the Local Campaign Finance Transparency Portal. Once a candidate is elected and serving in the elected official capacity, they will be added to the Guardian system and file the PFD there.
   With the anticipated increase in filed reports at the Political Subdivision level, an update was provided by Bruce Boone on the technology assisted review project with OMES which has started. OMES has the first set of data from the Guardian and will begin their internal work before we move into testing in October/ November with completion/deployment around Thanksgiving.

   d. **Emerging Issues: Artificial Intelligence – Constitutional Considerations**
   Bruce Boone continued with the artificial intelligence theme of prior commission meetings and discussed the constitutional concerns that might need to be addressed and considered should the Commission engage in efforts to address artificial

intelligence (AI) related to Ethics Rules. Looking at the constitutional framework Bruce Boone highlighted that political speech receives the highest level of First Amendment protection, especially when it concerns candidates and elections. At the same time, the government acknowledges the need for election integrity and ensuring voters know who is speaking to and for them. The difficult question is how to really advance those interests without regulating political viewpoints or asking the government to decide what is true or false in terms of political speech. Bruce Boone presented on disclosure verses prohibition, highlighting Supreme Court cases such as *Buckley v. Valeo* and *Citizens United v. FEC,* neither of which involved AI-content but instead provides the constitutional foundation for considering disclosure.

Further highlighting recent/ongoing case law, Bruce Boone presented on cases in California and Minnesota. California attempted to regulate materially deceptive election communications, essentially creating a prohibition which the court concluded was a burden on political speech. In Minnesota the constitutional challenge has not been resolved with the question of whether the state can prescribe a criminal penalty when a person knows or acts with reckless disregard as to whether an advertisement is a deepfake, which is technological representation (audio/video/image/etc.) that is so realistic that a reasonable person would believe the individual actually engaged in speech or conduct that did not occur.

Bruce Boone further provided constitutional questions for a disclosure model, where the current landscape stands for compelling AI disclosures and what Oklahoma approach should be considered if we were to consider a rule or rules involving disclosure relative to AI/synthetic media. Bruce Boone did note that the advisory group, when presented with similar information, leaned toward a recommendation of requiring disclosure in some form or fashion.

6. **Consideration, discussion, and possible action on the 2027-2031 Oklahoma Ethics Commission Strategic Plan.** Director Bruce Boone

Motion: Vice Chair Weintraub moved to approve the proposed 2027-2031 Oklahoma Ethics Commission Strategic Plan.

Second: Commissioner Wilt

Roll Call Vote: Weintraub– yes, Lucas– yes, Wilt – yes, Meek-yes

Motion Carried

7. **Proposed Executive Session**. Consideration, discussion, and possible action to enter Executive Session, as authorized by 25 O.S. 2021, § 307(B)(4) and (7) and 2005 OK AG 29, ¶12, regarding the numbered matters set forth below, for the purpose of having confidential communications between the Commission and its counsel, regarding pending investigations, claims, or actions; and to discuss matters for which disclosure would seriously impair the

ability of the Commission to proceed in the public's interest and would violate confidentiality under Ethics Rules 6.5 and 6.9. Chair Meek

i. Case No. CJ-2026-558, State of Oklahoma ex rel. Oklahoma Ethics Commission v. RFD & Associates, Inc., Oklahoma County District Court.
ii. Case No. 2026-14, alleging violations of Conflicts of Interest Rule 4.
iii. Complaints:

C-26-16	C-26-22
C-26-17	C-26-23
C-26-18	C-26-24

Statement by Attorney: The information to be discussed in Executive Session requires confidential communications between the Ethics Commission and its attorney(s) concerning pending investigations, claims, or actions, the disclosure of which would seriously impair the ability of the Ethics Commission to consider or process claims or conduct pending investigation(s), litigation, or proceeding in the public interest or violate confidentiality requirements under Oklahoma law and the Ethics Rules 6.5 and 6.9.

i. **Action to enter Executive Session.**

Motion: Commissioner Lucas moved to enter closed executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 8.

Second: Commissioner Wilt

Roll Call Vote: Weintraub– yes, Melton– yes, Wilt – yes, Meek-yes

Motion Carried to enter Executive Session at 10:40 a.m.

ii. **Action to exit Executive Session:**

Motion: Commissioner Lucas moved to return to Open Session at **12:46 p.m.**

Second: Commissioner Wilt

Roll Call Vote: Wilt– yes, Weintraub – yes, Lucas– yes, Meek-yes

Motion Carried.

During Executive Session, no votes were taken and no other matters were discussed other than the items listed on the agenda for executive session. Possible action on the above matters discussed in Executive Session. Chair Meek

Statement by General Counsel Kerr: General Counsel Kerr stated that the Commission had various recusals on multiple agenda items discussed in Executive Session. She asked if there were any additional recusals and there were none.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.7 to open a formal investigation into **Complaint C-26-16** based on a reasonable cause to believe that one or more violations of ethics rules have occurred.

Second: Commissioner Lucas

Roll Call Vote: Wilt – yes, Lucas – yes, Weintraub – yes, Meek – yes

Motion Carried.

Motion: Vice Chair Weintraub moved in **Complaint C-26-17** to authorize the Executive Director to resolve Complaint C-26-17 as discussed in executive.

Second: Commissioner Wilt

Roll Call Vote: Wilt– yes, Lucas – yes, Weintraub – yes, Meek – Abstain

Motion Carried.

Motion: Regarding **Case No. 2026-22**, Vice Chair Weintraub moved pursuant to Ethics Rule Ethics Rule 6.9, to authorize the Executive Director to resolve the matter as discussed in executive session and to release a public statement as discussed in executive session, for the reason that will provide an educational benefit.

Second: Commissioner Lucas

Roll Call Vote: Lucas – yes, Wilt – yes, Weintraub – yes, Meek – yes

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.7 to open a formal investigation in **Complaint C-26-23** based upon a reasonable cause to believe that one or more violations of the Ethics Rules have occurred.

Second: Vice Chair Weintraub

Roll Call Vote: Weintraub – yes, Wilt – yes, Meek – yes, Lucas – abstain

Motion Carried.

Motion: Vice Chair Weintraub moved pursuant Ethics Rule 6.7 to open a formal investigation in **Complaint C-26-24** based upon a reasonable cause to believe that one or more violations of the Ethics Rules have occurred.

Second: Commissioner Lucas

Roll Call Vote: Lucas – yes, Wilt – yes, Weintraub – yes, Meek – yes,

Motion Carried.

Statement by Chair Meek: Chair Meek stated that the Commission may only act on complaints and cases when a quorum is present, excluding any recused commissioners, and therefore is taking no formal action on **Compliant C-26-18**. Chair Meek continued and stated the Commission did not take any formal action on the following matters discussed in Executive Session: **Case No. CJ-2026-558**; and **Case No. 2026-14**.

8. **New Business.** Under Oklahoma Statute 25 O.S. § 311(A)(9), new business is limited to any matter not known or which could not have been reasonably foreseen prior to the time of posting of this agenda. Chair Meek.

   No new business.

9. **Adjournment. Chair Meek**

Motion: Commissioner Wilt moved to adjourn the meeting.

Second: Commissioner Lucas

Roll Call Vote: Lucas – yes, Weintraub– yes, Wilt – yes, Meek – yes

Motion Carried

Meeting ended at 12:53 p.m.

LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

Chair Meek