

OKLAHOMA ETHICS COMMISSION

April 9, 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, April 9, 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”], Howard Johnson [“Johnson”], 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”], General Counsel Margaret Kerr [“Kerr”], Deputy Director Jeremy Rogers [“Rogers”], Legal Assistant La Shounda Faye, Administrative Programs Manger Darci Ray, and Assistant Compliance Officer Aniston Emory.

Observing all or part of the meeting: H.J Reed, OKSPA; Travis Darling, Campaign Manager; Emma Murphy, Media; Jay Steagall, House Representative; Katrina Crumbacher, Media and Alex Gladden, Media.

2. Open Meeting Act Compliance.

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

3. Introductions and Announcements.

[Bruce Boone] No announcements.

4. 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.

5. Consideration, discussion, and possible action on minutes for the regular meeting and executive session held March 12, 2026. [Chair Meek].

Motion: Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on March 12, 2026.

Second: Commissioner Lucas

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

Motion Carried

6. **Introduction and explanation of a rulemaking request by Representative Jay Steagall regarding the contribution and expenditure threshold limit. [Chair Meek].**

Representative Jay Steagall presented a rulemaking request to lower the threshold that triggers candidate filing with the Ethics Commission. He explained HB 3306 proposed reducing the threshold from \$1,000 to \$400 to increase transparency, in light of State Question 836, which could have expanded participation in Oklahoma’s primaries.

Representative Steagall noted that, although the bill passed the oversight committee, it was not heard on the House floor and will become ineffective in November. Prior to presenting the bill, he consulted with the committee chairman, who believed lowering the threshold to \$0 was not reasonable; therefore, a \$400 threshold was proposed as a compromise.

Question by Commissioner Wilt asked how long the \$1,000 threshold has been in place?

Comment by Representative Steagall explained it may changed when the filing fee was adjusted.

Question by Wilt then asked whether the proposed \$400 was simply a suggestion?

Comment by Representative Steagall confirmed it was an arbitrary figure.

Question Vice Chair Weintraub inquired whether the \$400 amount was tied to any this specific, or if it was based on the view that \$1,000 is too high.

Comment by Representative Steagall agreed that it was not tied to any specific metric and he accepted the amendment to have the bill heard in committee.

Comment by Executive Director Bruce Boone stated that the proposal would apply to all campaign committees, affecting both state-level candidates and political subdivisions.

Comment by Commissioner Wilt agreed, noting that many would likely never reach the current \$1,000 threshold.

Comment by Executive Director Bruce Boone also pointed out that many committees are already preparing for a significant change as they begin filing with the Commission.

Question by Chair Meek asked what prompted the proposal, specifically whether there were any observations or concerns that led to the suggested changes?

Comment by Representative Steagall commented some individuals file for office without a genuine intent to run, which can negatively impact serious candidates since drawing an opponent may prompt unnecessary campaign spending. These measures can increase accountability, such as requiring disclosure of campaign funds and expenditures, and emphasized that all candidates should be required to file Ethics reports.

Comment by Chair Meek stated that, in his view, the Commission should take additional time to evaluate how the threshold is working for political before making any changes.

Commissioner Wilt expressed support for the proposal, noting that many lower-tier offices would not meet a threshold and that \$400 is a reasonable and acceptable amount.

Comment by Executive Director Bruce Boone noted that the Commission is still uncertain about the staffing needs once political subdivisions are fully implemented into the Guardian System, and this could potentially quadruple the Commission's workload.

She further explained that while the Commission may have overall numbers, it does not have detailed visibility into individuals within each political subdivision who may be serving in volunteer roles and therefore are not raising or spending \$1,000.

Additionally, she mentioned that the impact is difficult to determine at this time but it's something the Commission should be mindful of and consider carefully.

Comment by Representative Steagall suggested also proposed whether the threshold could be tied to whether an elected position included compensation.

Comment by Chair Meek stated that it was a good thought and emphasized that this is the type of dialogue that should continue.

Comment by Commissioner Johnson noted the suggestion is worthwhile.

Question by Commissioner Wilt asked whether the threshold would apply only to positions that receive some form of compensation.

Comment by Representative Steagall stated it could be tailored for any changes to positions where individuals are likely to receive compensation.

Comment by Commissioner Wilt noted that there is currently a Senate bill that would allow school board members to receive compensation regardless of average daily membership.

Comment by Representative Steagall stated that no decision needs to be made at this time. He is open to any suggestions from the Commission and willing to consider them moving forward with any potential changes.

Question by Commissioner Johnson asked would changes take effect next election cycle?

There were multiple responses indicating affirmation.

Comment by Executive Director Bruce Boone noted the importance of avoiding mid-election cycle implementation, as it could create inconsistencies in filing requirements between candidates in the same race.

Question by Vice Chair Weintraub asked what the original reasoning was for increasing the threshold from \$500 to \$1,000.

Comment by Executive Director Bruce Boone responded that she was unsure.

There were multiple requests for further investigation into when and why the change occurred.

Comment by Executive Director Bruce Boone also suggested the change may have been related to filing fees for office, noting that if candidates were paying approximately \$500 to file, it may have been viewed as appropriate to set the threshold higher.

Comment by Vice Chair Weintraub added that, based on the discussion, tying the threshold to compensation or a similar factor may make more sense.

Comment by Representative Steagall reiterated that he was open to continued discussion to develop an approach that works for all parties.

Question by Vice Chair Weintraub then asked whether initiating the rulemaking process would limit discussion to the specific proposal or allow broader evaluation.

Comment by General Counsel Kerr clarified that the process would focus on the specific proposed rule change, and suggested that if additional research was desired, it should be clearly stated in the motion.

7. **Consideration and discussion of potential gaps in current disclosure requirements for political advertisements and mailers, including whether to direct staff to further study or develop proposed rule amendments [Chair Meek].**

Executive Director Bruce Boone reported that several political mailers—believed to have been generated using AI—have raised concerns among multiple senators who contacted the Ethics Commission. She noted that two of the senators referenced are up for re-election, while the other two are not, which she described as a notable distinction in reviewing the issue.

She explained that the mailers differ in content, with the mailer involving Senator Green appearing distinct, while those referencing Senators Sacchiere, Deever, and McIntosh were very similar in language. Boone stated she would not discuss the specifics of the underlying bill but explained that it relates to a controversial issue involving protests in churches, which has generated discussion and concern.

Executive Director Bruce Boone further noted that the mailers contained no disclosure information, making it unclear whether they were issued by an individual, PAC, political party, candidate committee, or even an out-of-state entity. General Counsel Kerr has begun

preliminary review to determine whether the mailers may constitute a potential violation of Commission rules.

She explained that the distinction regarding which senators are currently candidates is relevant to applicability of rules such as electioneering communications (within 60 days of a general election or 30 days of a primary or runoff) and independent expenditures, which involve express advocacy for or against a clearly identified candidate.

Executive Director Bruce Boone also noted that committees are required to disclose expenditures for such communications, as are state question committees. She indicated that this situation may reveal a gap in current disclosure requirements, as it is unclear who, if anyone, properly reported the mailers. The Commission will review upcoming Quarterly Reports to determine whether any filings correspond to the mailers in question.

She concluded by stating that the matter was brought forward for the Commissioners' awareness due to concerns raised, including those from affected senators. Executive Director Bruce Boone asked whether, regardless of the source or timing of the communication, there should be a disclosure identifying who paid for it, and whether the Commission should consider amending the rules accordingly to address that requirement.

Question by Commissioner Johnson when is the next reporting period?

Comment by Executive Director Bruce Boone stated at the end of this month.

Question by Chair Meek asked in the event there was no reporting, how would the commission get to the bottom of finding the source.

Comment by Executive Director Bruce Boone explained that the only way to identify the source may be through a barcode; however, she noted that the Senators brought the matter to the Commission as a concern rather than a formal complaint. Because there is no confirmed violation and the sender is unknown, it is unclear whether current rules apply or whether the communication falls under the Commission's jurisdiction.

She further stated that, given these uncertainties, General Counsel advised against pursuing further investigation through the barcode at this time. Executive Director Bruce Boone noted that the issue may warrant consideration in a future rulemaking cycle, particularly regarding disclosure requirements for similar communications. It was also noted that the Commissioners may direct staff to conduct additional investigation.

Comment by General Counsel Kerr suggested that the Commission may wish to consider adopting a "catch-all" approach in the near future, requiring disclosures regardless of whether the communication qualifies as an independent expenditure or electioneering communication.

Comment by Vice Chair Weintraub asked whether the Commission should consider prohibiting the use of AI-generated images in mailer or advertisements.

Question by Chair Meek asked whether the Commission would need to take a vote on the matter or if staff could proceed with further exploration without such action?

Comment by Executive Director Bruce Boone stated that this guidance was sufficient and confirmed that the Commission would like staff to continue exploring the issue and potentially return with a proposed rule change.

Question by Vice Chair Weintraub asked whether a motion and vote were required to proceed with additional investigation.

Comment by General Counsel Kerr advised that no vote was necessary if the Commission is only continuing research.

Question by Executive Director Bruce Boone then asked whether a more specific investigation would require a vote?

Comment by General Counsel Kerr confirmed that it would not.

Executive Director Bruce Boone concluded that she has the guidance needed to proceed.

Comment by Commissioner Wilt stated that it seems like the Commission may not need to do an investigation unless somebody files a report.

8. **Consideration, discussion and proposed action on proposed Commission Comment regarding mileage reimbursement reporting requirements pursuant to Ethics Rules 2.43 and 2.106.[Chair Meek].**

General Counsel Kerr explained that Commission rules already require detailed reporting when reimbursements are made to a candidate. Specifically, Rule 2.43 allows a candidate committee to reimburse a candidate within 90 days, and Rule 2.106 requires those reimbursements to be reported in detail regardless of value. She noted that this differs from other expenditures under \$200, which are not required to be itemized in detail.

General Counsel Kerr mentioned that some reports currently group mileage reimbursements into large lump sums, making it unclear what the expenses represent, such as travel details or applicable mileage rates. She proposed developing a formal Commission Comment to provide a clear, consistent example. The intent is to improve transparency by ensuring contributors and the public understand what reimbursements are for, particularly in cases such as mileage.

Comment by Chair Meek asked whether any Commissioner or staff have any comments regarding General Counsel Kerr's proposed commission comment?

Question by Executive Director Bruce Boone asked should Comment include a date?

Comment by General Counsel Kerr stated that the Director of Compliance suggested including additional detail such as the date of the event—for example, “mileage reimbursement to/from a fundraising event on 3-11-26 at the Metro Library.” She added if the

Commission wishes to require additional detail, a Commissioner could move to approve the proposed Commission Comment with the inclusion of the event date.

Comment by Vice Chair Weintraub noted this is the same information that the IRS requires.

Motion: Vice Chair Weintraub moved, to approve and publish the Commission Comment to Rules 2.43 and 2.106 with the amendments as discussed.

Second: Commissioner Wilt

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

Motion Carried.

9. Executive Director's Report

a. **Budget Update**

Executive Director Boone reported that as of April 2, 2026, general operations are at 85% of the annual budget, slightly ahead of pace. IS services are at 58% of annual spending, slightly below year-to-date expectations. She noted total budget authority of \$2.9 million, with available cash from revolving funds. She projected the Commission will finish the fiscal year within its authorized budget, and the Commission's strong financial position supported its request for a flat budget with the Legislature. She confirmed the Commission is in solid financial condition, with conservative spending projected to keep it within budget through the fiscal year.

b. **Legislative Update**

Executive Director Boone reported that she is tracking Senate Bill 2180 regarding disclosure of countries of particular concern. The bill has passed one House committee and is currently pending in an oversight committee. Boone added that a special Commission meeting may be called to withdraw any overlapping rule if legislative action occurs before the Commission's May meeting.

Question by Commissioner Wilt Commissioner Wilt asked whether the bill was amended while in the House committee.

Comment by Executive Director Bruce Boone stated no, not so far.

c. **Compliance Update**

Executive Director Boone provided a compliance update, reporting that 97% of lobbyist liaison filings were submitted by the deadline. She noted that Personal Financial Disclosures are due May 15, with 45% filed as of April 7, 2026, and approximately 30% of remaining filers being governor appointees and cabinet members. Boone stated the goal is to replicate last year's 100% compliance through continued outreach and partnership efforts.

She also reported that candidate filing week was a three-day effort, including hosting more than 400 candidates on Wednesday, achieving 90% engagement with filers. Staff assisted 189 new registrations, and 3 of 11 filers were already registered in the Guardian system. Boone added that half-hour trainings were offered, educational materials were distributed, and 40% of new filers participated.

d. Guardian Update

Executive Director Bruce Boone stated that the Guardian integration for political subdivisions is ahead of schedule and currently in final testing. She noted that the interim site reflects approximately \$500,000 in contributions and that local filers are encouraged, though not yet required, to update register in the interim system. She added that staff are compiling a statewide contact spreadsheet to identify and track political subdivision filers.

e. Federal Digital Accessibility Deadline – Americans with Disabilities Act Accessibility Requirements

Executive Director Boone noted that federal ADA digital accessibility requirements take effect this month and will require remediation of the 10-year-old Guardian system in partnership with OMES and Adobe. She stated that staff are working with OMES to ensure compliance. She added that the Commission will need a statewide contract with Adobe.

10. 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. 2024-29, alleging violations of Campaign Finance Rule 2.
- iii. Complaints:
 - C-26-05
 - C-26-06
 - C-26-07
 - C-26-09

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 Wilt moved to enter closed, executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 10.

Second: Commissioner Weintraub

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

Motion Carried to enter Executive Session at 10:59 a.m.

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

Motion: Commissioner Johnson moved to return to Open Session at **1:30 p.m.**

Second: Commissioner Wilt

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

Motion Carried.

Possible action on the above matters discussed in Exec. Session. Chair Meek

Statement by General Counsel Kerr: General Counsel Kerr stated that the Commission had one recusal on one case. She asked if there were any additional recusals on anything discussed in Executive Session or any Motions to recuse, and there were none.

Motion: Vice Chair Weintraub moved, pursuant to Ethics Rule 6.10, to authorize the Executive Director to resubmit a settlement demand in **Case No. 2024-29** as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Wilt moved to Dismiss **Complaint C-26-05** based on the respondent's immediate corrective actions resolving a minor Ethics violation.

Second: Commissioner Lucas

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

Motion Carried.

Motion: Vice Chair Weintraub moved to Issue a public reprimand under Ethics Rule 6.7 regarding **Complaint C-26-07** based on reasonable cause to believe that one or more violations of Ethics

Rules have occurred.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Vice Chair Weintraub moved pursuant to Ethics Rule 6.7, to open a formal investigation into **Complaint C-26-09**, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred.

Second: Commissioner Lucas

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

Motion Carried.

Statement by Chair Meek: Chair Meek stated the Commission will not be taking any action today on the following complaint discussed in Executive Session: **C-26-06 and Case No. CJ-2026-558.**

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

11. **Adjournment. Chair Meek**

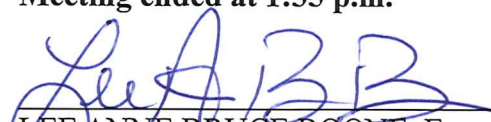
Motion: Commissioner Weintraub moved to adjourn the meeting.

Second: Commissioner Wilt

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

Motion Carried.

Meeting ended at 1:35 p.m.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



Chair Meek