

OKLAHOMA ETHICS COMMISSION

February 12, 2026

Regular Meeting

1. Call to Order.

Vice Chair Weintraub [“Weintraub”] called to order the meeting of the Ethics Commission of the State of Oklahoma [“Commission”] on Thursday, February 12, 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”], and Vice Chair Adam Weintraub [“Weintraub”]. 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, and Assistant Compliance Officer Aniston Emory.

Observing all or part of the meeting: Joseph Pierce, Senate; Thomas Schneider; OAG; Emma Murphy, Media; Keaton Ross, Media; Michelle Yirka, Chisholm Broadband; Andrea Hancock, Media; Alex Gladden, The Oklahoman, and Austin Manley, Manley Legal Services, LLC.

2. Open Meeting Act Compliance.

Vice Chair Weintraub 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 January 15, 2026. [Vice Chair Weintraub]

Motion: Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on January 15, 2026.

Second: Commissioner Wilt

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

Motion Carried

6. **Executive Director’s Report**

a. Budget Update

Executive Director Bruce Boone highlighted that the 200 revolving funds, which hold the registration fees paid through the Guardian system, reflect lower revenue registration fees for FY26 due to the inability to use the Guardian system. She also noted that she signed off on a requisition earlier this month showing that \$200,000 was received during the month of January, which will appear in next month’s budget report.

She further mentioned that the 212 fund reflects close to \$1.2 million remaining in the Guardian replacement fund after nearly \$1 million has been spent and does not anticipate that amount changing. Executive Director Bruce Boone also noted that the Commission has the budget for an investigator position and is currently in the process of finding someone to fill that role, which is why there appears to be a little extra in personal expenses.

b. Legislative Update

Executive Director Bruce Boone explained that two bills could impact the Commission’s current rules package. One was initially brought by Representative Duel and was later sponsored by the Commission. The rule requires lobbyists to disclose whether each lobbyist principal is a government, political party, individual, or entity located in—or with its principal place of business in—a country of particular concern as identified by the U.S. Department of State. The Commission has already banned contributions by foreign nationals to political campaigns. She noted that the Commission will not be responsible for maintaining this list, as the U.S. Department of State already maintains the list of countries of particular concern. She also mentioned that there is still some ongoing legislation related to this issue.

Executive Director Bruce Boone also discussed Senate Bill 660, sponsored by Senator Guthrie and Senator Bergstrom, which would create the Oklahoma Foreign Agents Registration Act. This legislation would require coordination between the Commission and the Attorney General’s Office because it proposes a criminal penalty. Additionally, Senate Bill 2180, sponsored by Senator Daniels, would create

the Foreign Country Agent Political Activity Oversight Act and would require foreign country agents to file with the Secretary of State.

The Commission's primary concern is to ensure that there are no conflicting requirements between the bills and that the process does not become overly burdensome for lobbyists in terms of registering or disclosing information in multiple places. She noted that all parties are currently in discussions and are aware that the Commission already has a rule in place addressing this matter.

Question by Commissioner Wilt asked, have either of the bills been presented in committee?

Comment by Executive Director Bruce Boone stated not yet.

Question by Commissioner Lucas asked if the rule in red is the original rule voted on that was submitted to the legislature.

Comment by Executive Director Bruce Boone stated yes that is what was proposed to the legislature.

c. Compliance Update

Executive Director Bruce Boone noted that the Commission experienced significant activity in January due to the deadlines for the 2025 3rd and 4th Quarter filings. The Commission sent an email to filers congratulating them, recognizing that there had been a great deal of transition during this period. Despite the challenges, 96% of 3rd Quarter reports were filed on time and 98% of 4th Quarter reports were filed on time. She thanked the Commission staff for being proactive during these transitions, which helped achieve this high compliance rate.

To ensure that no one was negatively impacted by the transition, the Commission granted an administrative 10-day grace period, which resulted in an additional 40 filers submitting their reports. The Commission will focus on diversion for the remaining late filers to provide them with another opportunity and offer additional education.

d. Guardian Update

Executive Director Bruce Boone explained that, after issues with Guardian 2.0, the Commission is temporarily unable to accept political subdivision reports, as the Legacy system was not designed for this function. Restoring stability and ensuring accurate, accessible reporting is the top priority. Civix is working on updating the system to incorporate the 2025 legislative change, which is expected to take 12–15 weeks.

Executive Director Boone outlined several interim options: filers could submit reports to the County Clerk, but the statute requires filing with the Commission; the Commission could revert to paper filings, though the Commission does not have the manpower to manage this; or temporary staff could be hired to assist with intake. She also noted that she has reached out to OMES for potential support in creating an interim public depository system while Civix updates the Legacy system to accommodate approximately 3,000 new filers. Another option would be to use a statewide contract to quickly develop a cloud-based interim depository system capable of receiving filings and allowing public access to reports.

Executive Director Bruce Boone asked for feedback and other potential solutions for political subdivision filers.

Comment by Vice Chair Weintraub stated that he wishes he had one.

Question by Commissioner Lucas asked besides OMES who else has the Commission reached out to?

Executive Director Bruce Boone commented that she reached out to someone the Commission has worked with previously who is on a statewide contract. She noted that, to obtain a quick solution, the Commission would likely need to work with someone on a statewide contract who would work at an hourly rate and from there determine how quickly a solution could be produced. She added that the Commission is weighing the potential cost against the time it would take to implement a solution.

Commissioner Johnson commented that his concern is how long it will take to get an interim solution in place.

Executive Director Bruce Boone explained that, through the statewide contract, resumes for temporary employees could be provided within a day. She noted that it might be possible to have something in place within a couple of weeks and that it would not be extremely expensive. She also stated that Civix is hoping to deliver a solution early; however, because it is an older system, the change will impact every part of the system.

Question by Commissioner Johnson asked whether there is a ballpark estimate for how much the interim replacement will cost.

Comment by Executive Director Bruce Boone commented that the Commission does not yet know the cost for the interim system; however, the initial estimate received from Civix for adding the political subdivision to the Legacy system is approximately \$100,000, though that estimate is still being finalized.

Question by Commissioner Johnson asked how long it would take before a recommendation could be made.

Executive Director Bruce Boone stated that she would like the Commissioners' input on these ideas. She would like the authority to approve hiring temporary staff and implementing a temporary cloud-based system.

Commissioner Lucas noted that whether Commission staff handles the work or temporary staff are hired, the cost will likely be about the same.

Comment by Executive Director Bruce Boone stated that the Commission is in a difficult position due to the status of the contract and may consider this as part of the damages resulting from the contract termination.

Comment by Vice Chair Weintraub mentioned that he recently attended a presentation by Westlaw, which focused heavily on document management and the system's ability to analyze documents. He suggested the Commission might consider speaking with them, though the system is on the more expensive side. This could also be considered as part of the damages the Commission might pursue.

Comment by Executive Director Bruce Boone stated that it is important to do this the correct way and ensure transparency. She added that, despite the temporary roadblock, the Commission is exploring every option and resource to make the system available to the public.

Commissioner Lucas asked what the next option would be if the Commission decided not to implement a temporary interim solution.

Executive Director Bruce Boone explained that, in that case, the Commission would simply wait until Civix completes the updates to the Legacy system.

e. LOFT Update

Executive Director Bruce Boone highlighted that the Commission has been implementing the Diversion Program more routinely, aligning with both the Commission's Strategic Plan and discussions with LOFT to take a more proactive approach to compliance. The program was offered upfront to all late filers for their 3rd and 4th Quarter reports. She also noted that, due to limited internal IT resources, the Commission has faced challenges in making the campaign finance system fully operational for public use.

Deputy Director Rogers presented the Commission's new campaign finance system, AdImpact, which is now in use and publicly accessible through the Commission's website. AdImpact is a political advertising media monitoring

system that allows users to view how and where campaigns have spent money on media and advertising across the state of Oklahoma.

Question by Vice Chair Weintraub asked if the AdImpact tab is located on the Commission's homepage?

Comment by Deputy Director Rogers confirmed and demonstrated how to access the AdImpact button.

Comment by Executive Director Bruce Boone thanked the Corporation Commission for volunteering their IT resources.

Comment by Deputy Director Rogers noted that Jesse Pineda and Brian Linn with the Corporation Commission have been very helpful with several of the Commission's projects.

Question by Commissioner Wilt asked whether the media markets on the boarder are based in Texas, Arkansas, Colorado and Missouri?

Comment by Deputy Director Rogers clarified that the available markets include Oklahoma City, Tulsa, Fort Smith AR, Sherman, TX and Wichita Falls.

Question by Commissioner Wilt asked if this just covers television?

Comment by Deputy Director Rogers explained that it includes not only television but also desktop, mobile, CTV and radio.

Comment by Executive Director Bruce Boone stated that AdImpact is a very useful tool. While it may not capture every dollar spent, it reflects a substantial portion and will also assist the Commission in conducting investigations.

7. Introduction and explanation of a rulemaking request submitted by Representative Meloyde Blancett regarding regulation and disclosures of independent political expenditures. Vice Chair Weintraub.

Comment by Representative Meloyde Blancett explained her rulemaking request regarding the regulation and disclosure of independent political expenditures. She referenced an interim study conducted this fall with assistance from Executive Director Bruce Boone and Commission staff.

Representative Blancett asked the Commission to consider several potential rules, including requiring disclosure of donors with donor opt-in requirements for PACs, Super PACs, LLCs, and campaign 501 organizations; requiring the top four donors to be disclosed on advertising and communications; requiring full contact information when

creating a campaign entity, such as a copy of a government-issued ID; and adding fines for failure to communicate with the Ethics Commission. She stated she was in the processes of drafting legislation to address these issues, and the Attorney General's Office had advised the measures should fall under the Ethics Commission's purview, and her request is to help make Oklahoma elections have more integrity and transparency.

Question by Vice Chair Weintraub asked whether the issues being addressed were included in the Campaign Legal Center's (CLC) Arizona Voters' Right to Know Act?

Comment by Representative Blancett that Arizona's Voters' Right to Know Act was a comprehensive reform to increase transparency, and the measure passed as a state question but is currently being challenged in the courts by the GOP.

Question by Commissioner Wilt asked if she could give more information on the Interim Study that was conducted in the Fall and who attended.

Representative Blancett explained that the interim study was open to the public and was a collaborative effort between the Campaign Law Center and the Ethics Commission and was presented to the legislative committee members to which it was assigned.

Question by Commissioner Wilt asked who testified.

Representative Blancett stated that Campaign Law Center and Executive Director Bruce Boone testified.

Question by Commissioner Lucas asked how this might affect PACs or Organizations that are not registered in Oklahoma but registered federally?

Representative Blancett explained it would require them to register if they spend or invest in an Oklahoma election these rules would apply.

Comment by Commissioner Johnson stated that Citizens United created many challenges, but he applauded Representative Blancett on her presentation.

8. 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. Vice Chair Weintraub

- i. RFD & Associates, Inc.; discussion of potential claims and cause(s) of action.
- ii. 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. CV-2025-2636.
- iii. Case No. 2024-38, alleging violations of Campaign Finance Ethics Rule 2.
- iv. Case No. 2024-32, alleging violations of Conflicts of Interest Rule 4.
- v. Complaints:
 - C-25-18
 - C-25-23
 - C-26-01

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 Johnson moved to enter closed, executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 9.

Second: Commissioner Wilt

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

Motion Carried to enter Executive Session at 11:07 am.

ii. Action to exit Executive Session:

Motion: Commissioner Johnson moved to return to Open Session at **12:27 p.m.**

Second: Commissioner Lucas

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

Motion Carried.

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

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.

Motion: Commissioner Wilt moved to allow the Attorney General's office to proceed in **Case No. CJ-2026-558** as discussed in executive session.

Second: Commissioner Lucas

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

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rules 6.9, to authorize the Executive Director to take the action in **Case No. 2024-38** as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.7, to release the Notice of Allegations from **Case No. 2024-32** as it is in the public interest and will provide an educational benefit.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.9, to release a Public Statement on Complaint **C-26-02** as discussed in Executive Session for the reason that it is in the public interest and will provide an educational benefit.

Second: Commissioner Lucas

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

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.7, to open a formal investigation into Complaint **C-26-03**, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred.

Second: Commissioner Johnson

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

Motion Carried.

Statement by Vice Chair Weintraub: Vice Chair Weintraub stated the Commission will not be taking any action today on the following complaint discussed in Executive Session: **C-26-04**

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. Vice Chair Weintraub

9. **Adjournment. Vice Chair Weintraub**

Motion: Commissioner Wilt moved to adjourn the meeting.

Second: Commissioner Lucas

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

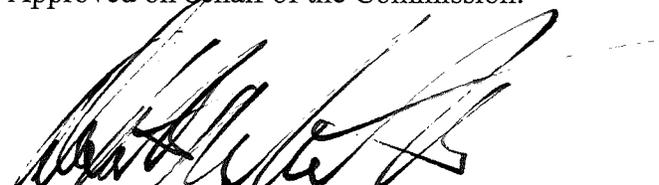
Motion Carried.

Meeting ended at 12:31 pm.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



Vice Chair Weintraub