

OKLAHOMA ETHICS COMMISSION

January 15, 2026

Regular Meeting

1. Call to Order.

Chair Justin Meek ["Meek"] called to order the meeting of the Ethics Commission of the State of Oklahoma ["Commission"] on Thursday, January 15, 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, and Assistant Compliance Officer Aniston Emory.

Observing all or part of the meeting: Kade Renfro, Future Campaign; Emma Murphy, Media, Lauren Henry, Media; Todd Jackson, Media; Andrea Hancock, Media; Alex Gladden, Media; H.J. Reed, OKSPA; Caleb Leyva, Photographer; Dylan Brown, Media; Brett Robinson, and Steve Metzger, 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 a Commissioner or Commissioners 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 special meeting and executive session held December 19, 2025. [Chair Meek]**

Motion: Commissioner Wilt moved to approve the minutes for the special meeting and executive session held on December 19, 2025.

Second: Commissioner Lucas

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

Motion Carried

6. **Consideration, discussion, and possible action of the following Ethics Rules Amendments (ERA), which proposals, comments received and proposed changes submitted, were the subject of the Public Hearing on December 19, 2025. [Chair Meek]**

1) Consideration, Discussion, and possible action on **ERA 2025-01** of the Constitutional Ethics Rules. Chair Meek.

- i. Executive Director Bruce Boone explains that this amendment is to modify Rule 2.19 to increase the cash contribution limit from \$50.00 dollars to \$200.00 dollars.
- ii. Comment by Commissioner Johnson mentioned that during an open meeting in Lawton, 3 or 4 individuals mentioned that they were all for this rule change.
- iii. Executive Director Bruce Boone recalled that they described in a smaller town if you donate and it is reported, depending on who you donated to, your company may not be frequented as much. They would like to donate a little more.

Motion: Commissioner Johnson moved to adopt **ERA 2025-01** as originally proposed.

Second: Commissioner Wilt

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

Motion Carried

2) Consideration, discussion, and possible action on **ERA 2025-02, Options 1 and 2** of the Constitutional Ethics Rules.

- i. Executive Director Bruce Boone explained that there are two options to modify Rule 2.48. Both options would add a provision allowing committees with remaining funds at the time of dissolution to use those funds for exploratory activities. Option 1 would extend the dissolution time limit to six months, while Option 2 would extend the time limit to one year.
- ii. Comment by Chair Meek stated that some of the Commissioners had previously been a part of the legislature and wondered if they had an opinion.

- iii. Comment by Commissioner Wilt stated that he would go with one year.
- iv. Comment by General Counsel Kerr stated that this rule has to stay consistent with Rule 2.116 **ERA-2025-04**.
- v. Comment by Executive Director Bruce Boone stated that this is to address the issue where Committees are coming up at their end of term of office and have a short time to decide on what to do with their funds. This would give them time to explore their options.

Motion: Commissioner Wilt moved to adopt **ERA 2025-02, Option 2**, as originally proposed.

Second: Commissioner Lucas

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

Motion Carried

- 3) Consideration, discussion, and possible action on **ERA 2025-04, Options 1 and 2** of the Constitutional Ethics Rules. Chair Meek

Motion: Commissioner Wilt moved to adopt **ERA 2025-04, Option 2**, as originally proposed.

Second: Vice Chair Weintraub

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

Motion Carried

- 4) Consideration, discussion, and possible action on **ERA 2025-03** of the Constitutional Ethics Rules.

- i. Executive Director Bruce Boone explains that this modification is to update the definition of a PAC which is a Political Action Committee to include any one person or more than one individual.
- ii. Comment by Vice Chair Weintraub mentioned that the Commission received a significant number of comments on this rule at last month's Commission meeting and moved to withdraw the rule.

At 10:14 the Commission took an informal recess for around 5 minutes, until approximately 10:20 am.

- iii. Comment by Executive Director Bruce Boone reiterating that there may be some additional considerations brought in the future that could be included as a package for the Commission's consideration.

- iv. Chair Meek thought it might be helpful to have the advisory group look at this proposed rule to do some more reviewing before it is presented for vote.
- v. Comment by Commissioner Lucas stating that he had similar comments about the proposed rule change.
- vi. Comment by Commissioner Johnson agrees with Chair Meek's comment.

Motion: Commissioner Weintraub moved to withdraw **ERA 2025-03** from consideration at this time.

Second: Commissioner Lucas

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

Motion Carried

- 5) Consideration, discussion, and possible action on of **ERA 2025-05** of the Constitutional Ethics Rules.
 - i. Executive Director Bruce Boone explained that the modification is to add definitions for “traditional business expenses” and “de minimis amounts.”
 - ii. Comment by Commissioner Lucas stated that, for consistency with other parts of the rules, the word “meals” should be stricken and replaced with “food and beverage.”
 - iii. General Counsel Kerr noted that this rule is tied to Ethics Rule 5.6, which includes the phrase “traditional business expense.”
 - iv. Comment by Executive Director Bruce Boone asked whether it would be appropriate to make a motion to modify the definition at the time of action on the rule.
 - v. Comment by Commissioner Wilt stated that it would be the second option and proceed to give an example of how to make the motion.
 - vi. Comment by General Counsel noted that any modifications made today are spelled out for purpose of clarity.

Motion: Vice Chair Weintraub moved to adopt **ERA 2025-05**, with the amendments proposed today, and to strike the word “meals” in paragraph 11 and replace that word with the words “food and beverage.”

Second: Commissioner Johnson

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

Motion Carried

- 6) Consideration, discussion, and possible action on **ERA 2025-06** of the Constitutional Ethics Rules.

- i. Executive Director Bruce Boone explained that this modification would be adding a provision for lobbyist disclosure of countries of particular concern.
- ii. General Counsel Kerr noted that this rule ties in with Rule 5.6 with the same verbiage, and the same modification that is proposed.
- iii. Executive Director Bruce Boone stated that one is for Executive Lobbyist, one is for Legislative Liaisons, and one for Legislative Lobbyist.
- iv. Comment by Commissioner Wilt asked if any Lobbyists in the room wished to make any comments. No one had comments.

Motion: Commissioner Wilt moved to adopt **ERA 2025-06**, as originally proposed.

Second: Commissioner Johnson

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

Motion Carried

7) Consideration, discussion, and possible action on **ERA 2025-07** of the Constitutional Ethics Rules.

- i. Executive Director Bruce Boone explained that the modification would be to add a provision requiring lobbyists to disclose activities related to countries of particular concern. This provision would be included as a separate section within the Rules to ensure comprehensive coverage.

Motion: Commissioner Lucas moved to adopt **ERA 2025-07**, as originally proposed.

Second: Commissioner Wilt

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

Motion Carried

8) Consideration, discussion, and possible action **ERA 2025-08** of the Constitutional Ethics Rules.

- i. Comment by Executive Director Bruce Boone explained that this modification would be adding a provision for traditional business expenses. Important to look at the “and” and “or” in this section.
- ii. Comment by Commissioner Wilt stated that it’s an appropriate change.
- iii. Comment by Vice Chair mentioned that he was unsure if it was necessary but did not oppose the idea, noting that “or” implies one may follow Rule 5.2 or proceed as otherwise permitted.
- iv. Commissioner Lucas asked whether any existing rules contradict this provision.
- v. Comment by General Counsel Kerr noted that Rule 5.7 has meal limits for legislative liaisons and legislative lobbyist with a limit of \$750.00. The word “or”

could lead one to question, “So am I limited to \$750.00 or traditional business expense.” So, the Commission proposes to consider the word “and” for clarity.

- vi. Comment by Chair Meek that seems to make sense.
- vii. Comment by Commissioner Johnson stated that it adds some clarity.
- viii. Chair Meek asked whether, if this rule is changed, would there be a comment or staff memo explaining the modification.
- ix. Comment by General Counsel Kerr stated yes, emphasizing that the goal is to make the rule clear and to help people with their filing and to be compliant.
- x. Comment by Executive Director Bruce Boone that the concern is ensuring no one could argue that the “or” refers to the \$750.00 limit, implying that traditional business expenses, including food and beverage, would not be subject to that limit. The Commission wants to make it crystal clear that the limit still applies.
- xi. Comment by H.J. Reed, Executive Director of Professional Advocates, the sponsor of this rule change, that they fully support the modification and confirm that everything is captured and falls under the \$750.00 limit.

Motion: Commissioner Johnson moved to adopt **ERA 2025-08** with the amendments proposed today, changing the word “or” to “and.”

Second: Commissioner Wilt

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

Motion Carried

10.) Consideration, discussion, and possible action on **ERA 2025-09** of the Constitutional Ethics Rules.

- i. Executive Director Bruce Boone explained that this modification would repeal Rule 5.8 in its entirety. If the Commission moves forward with changes to the other rules regarding what constitutes a gift and how those rules are defined, this section will become obsolete. The full intent is to provide transparency in the reporting of the \$750.00 limit.
- ii. Comment by Vice Chair Weintraub asked whether a vote to adopt the amendment would include striking the language in Rule 5.8.
- iii. Comment by General Counsel Kerr mentioned it is not suddenly that there is not a limit. It’s just not limited to an infrequently occurring event.

Motion: Commissioner Wilt moved to adopt **ERA 2025-09** as originally proposed.

Second: Commissioner Johnson

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

Motion Carried

7. Consideration of **ERA 2025-10**. The amendment to Ethics Rule 5.16.
 - i. Executive Director Bruce Boone explained that this modification would add a provision allowing lobbyist principals to provide food and beverage during legislative sessions, applicable to either house of the Legislature.
 - ii. Comment by Commissioner Wilt gave an example of one or both chambers working late during a deadline week, with a lobbyist principal providing dinner in the House or Senate lounge so members can continue participating in Q&A and floor action.

Motion: Commissioner Lucas moved to adopt **ERA 2025-10** as presented.

Second: Commissioner Wilt

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

Motion Carried

8. **Consideration, discussion and possible final action on the Commission's official promulgated rules and rule amendments for Year 2026. Chair Meek.**

Motion: Commissioner Wilt moved to direct Executive Director Bruce Boone to deliver the rule changes to the Legislature and Governor as required in the Oklahoma Constitution, Article 29.

Second: Commissioner Johnson

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

9. **Executive Director's Report**

a. Budget Update

Executive Director Bruce Boone discussed the Commission's individual budget reports, stating that the Commission is in a positive position. She noted that all Commission accounts are in good standing and on track as expected. She emphasized that the primary focus today would be the budget report submitted to the Legislature this week, along with her presentation to the Senate subcommittee. She noted that the Commission's appropriation funds for political subdivisions

increased from \$150,000 in FY25 to \$300,000 in FY26. In the financial resource analysis, she noted that all appropriated funds must be expended, as the Commission is not permitted to carry over any appropriated funds. She also highlighted key accomplishments for FY25, including a 92% increase in compliance training and outreach, which resulted in a 25% reduction in ethics violations and nearly a 50% decrease in complaints. She mentioned that the Commission had planned to launch a statewide campaign for political subdivision; however, due to system issues, the launch will be delayed for a few more months while political subdivisions are being implemented into the Legacy system.

b. Legislative Update

Executive Director Bruce Boone explained that 600 Bills had been filed yesterday, and she is sure more Bills will be filed today as today is the filing deadline. She does not have an update today on all the bills that have been filed related to the Ethics Commission. Some of the Bills that carried over from the 2025 session that are of interest to the Commission are the following: Senate Bill 82 mandatory Ethics training, Senate Bill 660 FARA Act, and Senate Bill 1206 where the public can address a public body on any item on the agenda.

c. Compliance Update

Executive Director Bruce Boone stated that you will not see a lot of changes regarding the update because we have not had any Third or Fourth Quarter reporting yet due to the transition between Guardian 2.0 and the Legacy Guardian System. It is important to note that those reporting dates are coming soon at the end of January. With returning to the Guardian, there have been 112 candidates, 67 PACs, and 368 lobbyist registrations submitted. For upcoming deadlines, 100% of the Executive Lobbyists have filed their Third Quarter reports. 78% of lobbyists have filed for their July-December reporting period. To date, Third Quarter reports for candidates and PACs have 46% already filed and 26% for Fourth Quarter reports.

d. Guardian Update

Executive Director Bruce Boone stated we have transitioned back to our Legacy vendor, and we established reporting deadlines. We had a meeting with Civix which was a breath of fresh air because they are geared up to serve as true partners to us. We have a new liaison, and they are working on our change requests. We are expecting to have a timeline for when we can anticipate political subdivisions implementation soon.

e. LOFT Update

Executive Director Bruce Boone stated we are going to be doing some comprehensive audits which are new for the Commission. We are going to be looking at the top 10 for contributions and expenditures from both the Third and Fourth Quarter reports. Once all reports are submitted, we will notify them and ask for relevant, appropriate documentation. We have been able to implement our new case management system called Clio. This will assist us in monitoring the time we spend on cases, ensuring we have proper documentation, and in calendaring throughout the process. We have set up quarterly meetings for the year with our Advisory Group which was part of our strategic plan.

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. 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, Weintraub – yes, Wilt – yes, Johnson – yes, Meek – yes

Motion Carried to enter Executive Session at 11:19 am.

ii. Action to exit Executive Session:

Motion: Commissioner Lucas moved to return to Open Session at **12:32 p.m.**

Second: Commissioner Wilt

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

Motion Carried.

Possible action on the numbered matters discussed above in Executive 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.

Motion: Vice Chair Weintraub moved to approve the agreed-upon resolution in **Case No. 2024-38**, requiring the Respondent to amend all quarterly reports from 2022 to present which includes the Respondent providing the itemization and details for all mileage reimbursements as required by Rule 2.106. This is to be performed on or before February 17, 2026.

Second: Commissioner Wilt

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

Motion Carried.

Motion: Commissioner Wilt moved to direct the Executive Director to sign the Settlement Agreement submitted by the Respondent in **Case No. 2024-32** and to issue the statement that was discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Wilt moved to dismiss Complaint **C-25-23**, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Lucas

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

Motion Carried.

Motion: Commissioner Weintraub moved to dismiss Complaint C-26-01, because there is no reasonable cause to believe that violations of the Ethics Rules occurred.

Second: Commissioner Wilt

Roll Call Vote: Lucas – yes, Johnson – yes, Wilt – 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 cases and complaints discussed in Executive Session: **Case No. 2022-25** and **C-25-18**.

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**

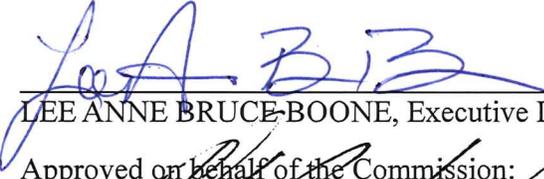
Motion: Commissioner Johnson moved to adjourn the meeting.

Second: Commissioner Weintraub

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

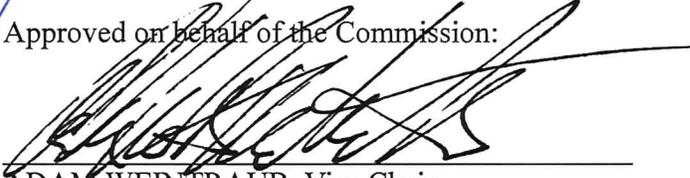
Motion Carried.

Meeting ended at 1:07 pm.



LEE ANNE BRUCE-BOONE, Executive Director

Approved on behalf of the Commission:



ADAM WEINTRAUB, Vice Chair