

OKLAHOMA ETHICS COMMISSION

July 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, July 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"], 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"], Administrative Programs Manager Darci Ray, Compliance Officer Tyler Fixley, Senior Compliance Officer Kathryn White, and Compliance Specialist Aniston Emory.

Observing all or part of the meeting: Noah Mack, Press; Scott Cassady, Press; Emma Murphy, Media; Allison Tien, Self-Employed; Teegan Smith, Press; Ben Latham, KWTW; David Oakley, Media; Haley Hetnick, KWTW – News 9; H. J. Reed, OKSPA.

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] Introducing Kathryn White, the new Senior Compliance Officer.

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 special meeting and executive session held June 5, 2026. [Chair Meek].**

Motion: Commissioner Wilt moved to approve the minutes for the special meeting and executive session held on June 5, 2026.

Second: Commissioner Lucas

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

6. **Consideration, discussion, and possible action on Advisory Opinion 2026-01 regarding campaign finance Rules 2.81 and 2.94, and how the application of the rules would apply to a Political Action Committee (PAC) registered with the Federal Election Commission as an Independent Expenditure only committee. [Chair Meek].**

General Counsel Kerr explained that the request was based on two Ethics Rules, 2.81 and 2.94. Ethics Rule 2.81 requires a PAC to have a Treasurer who is an Oklahoma resident. Ethics Rule 2.94 requires a PAC to have a depository account with a financial institution that regularly does business in Oklahoma. The requestor has asked if their PAC is in compliance if a Treasurer who is not an Oklahoma resident agrees to accept or appoint a service agent in Oklahoma, agrees to jurisdiction in Oklahoma, and agrees not to object to personal jurisdiction. Related to the financial institution, their request is whether they are in compliance having a financial institution outside of Oklahoma but agrees to any request for bank records. Ethics Rule 2.96 says that FEC PACs do not have to maintain an Oklahoma bank account if they only make contributions to candidates. Ethics Rule 2.98 says that FEC PACs do not have to register or report in Oklahoma if they are only making contributions.

General Counsel Kerr's states based on the Ethics Rules and the Constitutional provision that the request is outside the scope of an advisory opinion. It appears the requestor may be asking for an exception or waiver of the Ethics Rules, but waivers are only granted for pre-existing relationships, not waivers for application of the Ethics Rules. General Counsel Kerr submits to the Commission these issues that were brought up by the requestor may be something that the Commission wants to consider for a future rule change but it is not proper for an advisory opinion.

General Counsel Kerr states that the options before the Commission today are, if this is a valid advisory opinion request, the Commission can vote to move forward with the process. If it is agreed that this request does not fall under the scope of an advisory opinion, it can be voted upon to not move forward. The Commission can also consider a potential rule change on one or both of those rules in the future.

Vice Chair Weintraub asked if there has been another request like this and how great of a need would it be for a rule change.

General Counsel Kerr states that this is the only request she has been made aware of specific to this issue.

Chair Meek asks if there has been any feedback or knowledge of this request?

General Counsel Kerr states there has been no feedback, but several individuals have requested a copy of the advisory opinion request through Open Records Requests.

Chair Meek asked what happens next if the advisory opinion request is not obliged or agreed upon at this stage.

General Counsel Kerr states an option that the requestor would have is to submit a request for a proposed rule change

Vice Chair Weintraub asked about application of these rules.

General Counsel Kerr stated that if the Commission wants to explore a rule change, we could start by looking at other states and how they are addressing residency requirements, the benefit of keeping the rule as is, the benefit of making a rule change, and how that would further the Commission's goals to increase transparency.

Chair Meek states that the rules are clear to him and agrees that it seems to be a request for a waiver. He then asks if the Freedom PAC has standing to request a rule change.

General Counsel Kerr confirmed that anyone is able to request a rule change.

Vice Chair Weintraub stated that he did not like the idea of a waiver and does not believe that there is enough of an issue with the rules to engage in the rule making process.

Chair Meek states that it would make sense to start looking at what other states are doing.

Motion: Vice Chair Weintraub moved to not proceed with **Advisory Opinion 2026-01** as the request is outside the scope of the Ethics rules and the Oklahoma Constitution and for staff to begin researching for possible rule making process related to the subject.

Second: Commissioner Wilt

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

Motion Carried

7. **Consideration, discussion and possible action on registration and administration fees for The Guardian System for FY 2027 for Annual Fees for Lobbyists, Legislative Liaisons, Lobbyist principals, Political Party Committees, Political Action Committees, and per campaign fee for Candidate Committees. [Chair Meek].**

Executive Director Bruce Boone states that the current fees were updated in 2023, but we would like to remain with the current rates. There is no reason to increase the fees right now as our budget is meeting our needs. We recommend there not be an increase.

Commissioner Wilt asked if the lobbyist fees were a part of a state statute and that we could not increase them even if the Commission wanted to.

Executive Director Bruce Boone confirmed they were state statute and that we would not be able to increase lobbyist fees.

Motion: Vice Chair Weintraub moved to maintain the current rates for Administration and Registration fees for FY 2027 as continuing with the current Administration and Registration fees.

Second: Commissioner Wilt

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

Motion Carried.

8. **Executive Director's Report**

a. **Budget Report**

Executive Director Bruce Boone reported that the FY 2027 budget work program has been approved by the Legislature. We are investing additional dollars in education and compliance. We are adding an Ethics Education Specialist. They will essentially be the CEO of education training.

b. **Compliance Report**

The change from last month regarding our Compliance update is that we have an additional 250 candidates registered. Our reports filed for the Interim portal for local candidates has dropped since last month, but that is expected as the Guardian is now available for local filers. We have had an increase in Lobbyist proposed orders, but a decrease in Candidates proposed orders.

c. **Guardian and Political Subdivision Update**

For political subdivision integration into the Guardian, we are a little bit behind where we hoped to be for Phase 2 but are almost done with the process. There has been a 73% increase in our site from visitors starting from June 2025 to June 2026. This shows the educational aspect we have been working on has been making a difference and people are additionally visiting our webpage and all other sites to get more information.

d. **LOFT Update**

A year after LOFT gives their initial report with recommendations, LOFT returns to the agency and asks what the progress is. We have completed everything that LOFT recommended besides avoiding opening an investigation into an elected official during the legislative session.

e. Emerging Issues: Artificial Intelligence in Campaign Communications

Each Commission meeting in the next couple of months, we would like to discuss what other states are doing regarding AI in Campaign Communications and how they might fit in Oklahoma. We start by taking a look at Maryland although their AI laws are a little bit different because it is not specifically Campaign Finance Disclosure. Maryland SB 361 in 2025 expands election fraud to include the use of deep fakes or synthetic media. It prohibits using fraud to influence a voter's voting decision, it defines what synthetic media is, and it places enforcement within Maryland's election laws. Maryland did not frame this as a Campaign Finance Disclosure law instead it amended election fraud statutes. It requires fraudulent intent, an effort to influence a voter, and it is enforced through an election or criminal law, rather than through their Ethics Commission. We could do a two-track approach if the legislature is interested in determining what conduct constitutes election fraud over a criminal offense. Along with that, we could make a rule change regarding transparency and disclosure in campaigns that would be a companion. The Ethics Commission's jurisdiction has civil enforcement and is transparency focused where we could require disclosure on anything that has generated or altered material. From research, this has not been contested in Courts and there has not been a case that has appealed. It is important for the Commission to see the difference in what might be within the Ethics Commission's jurisdiction vs what is in the purview of the legislature. If the Commission is interested, we can work on our portion of it and speak with the legislature about the concern.

Commissioner Lucas asked how many cases have challenged this law in Maryland.

Executive Director Bruce Boone stated that is something we can look at, but there has not been a case found that has challenged the Constitutionality of this statute.

Chair Meek asked whether the Oklahoma legislature is interested in pursuing something similar to what Maryland is doing.

Executive Director Bruce Boone stated that she is unaware if the legislature is interested in pursuing a matter like Maryland's, but that this is something that has been brought up in the past. They may be willing to entertain a discussion.

Commissioner Wilt asked if there are any interim studies related to this matter.

Executive Director Bruce Boone stated that she has not seen the final list of interim studies yet.

Commissioner Weintraub stated that he liked that Maryland made it fraud and that it requires intent to influence the voter.

Executive Director Bruce Boone stated it is one approach a state has taken, so it would be good for us to explore what other states are doing.

f. Supreme Court ruling in *National Republican Senatorial Committee, et al. v. FEC, et al.*, (Case No. 24-621) regarding campaign finance and how this case may affect enforcement and application of the Ethics Rules

This Supreme Court ruling has a lot of interest from an Oklahoma basis and how this ruling may affect the Ethics Rules. On June 30, 2026, the Supreme Court held that the federal limits on how much a political party can spend in coordination with its own federal candidates violated the First Amendment. Political parties and their candidates have a constitutional right to coordinate that campaign spending without the federal spending caps, and they overturned prior precedent that upheld those limits. The most important thing for the Commission to think about is how this may affect our Ethics Rule. Coordination, cooperation, consultation, or acting in concert falls within independent expenditures. If an alleged independent expenditure or electioneering communication is made in coordination, cooperation, consultation, or in concert with at the requestor's suggestion of a candidate or a candidate's committee or their agents then the expenditure becomes a contribution to the candidate committee. Ethics Rule 2.32 places limits on political party committee contributions to a candidate. This Ethics Rule has not been overruled; political party contributions are still restricted in terms of the contribution limit. It is only that coordinated expenditures can no longer be restricted. For immediate purposes, we will have political parties log their coordinated expenditures as normal, but they will include "coordinated" in the description of the expense. This is to ensure we are following the Supreme Court's decision.

g. Strategic Planning Discussion (2027-2029)

Our strategic plan ends at the end of this year, and we would like to discuss the strategic plan for the next 3 years. These are the common themes identified when having individual discussions with the Commissioners: fair and impartial enforcement, education and prevention, transparency and public trust, public understanding of our role, accessibility and customer service, and preparing for emerging issues. One of the strongest points of agreement when discussing our strategic plan is that enforcement remains our constitutional responsibility and will always be the core of what we do. Many talked about expanding outreach and education as a way to be proactive and prevent violations before they occur.

Education is one of our great opportunities over the next several years. Many commented that true success would not be measured by more enforcement actions, but by less violations. With transparency and public confidence, Commissioners mentioned campaign finance disclosure, making information easier to access, increasing public understanding of our work, examining conflict of interest disclosures, and looking for additional opportunities to provide sunshine while

respecting confidentiality and due process. Some priorities the Commission may prepare for in the coming years are expanding education and outreach to promote voluntary compliance, to continue improving transparency, to strengthen public understanding, to improve accessibility through technology, simplified processes, and customer service. The big question is in 3 years from now, how do we know we have been successful?

Chair Meek stated that he loves the idea of fewer violations and that is the ultimate measure of success.

Commissioner Wilt stated that increase in public trust is intriguing. One way to do that is when we do enforcement to tell the public what we can regarding the respondent and enforcement actions. Do we have a sense of how the public feels about us now?

Executive Director Bruce Boone stated that it would be interesting to get a sense of how the public feels.

Vice Chair Adam Weintraub stated that he shares the intrigue about what increasing public trust may mean and how we achieve it. Something we may need to examine is whether we need to increase our role and our purview, so that the Ethics Commission and Ethics Rules become more similar to the Ethics rules that attorneys have where it is not merely campaign finance, but a more behavioral expectation and appearances of propriety.

Executive Director Bruce Boone stated that some things we can explore to increase public trust are the use of surveys and people within our role of regulation and outside of that role to capture some impressions. Another idea is to have our Commission meetings on the road, instead of always in the Capitol to reach the community. Obviously, this is a work in progress, and we will continue to discuss in the coming months.

9. **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. 2026-13, alleging violations of Campaign Finance Rule 2.
- iii. Complaints:
C-25-18, C-26-17

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: Vice Chair Weintraub 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: Weintraub– yes, Lucas– yes, Wilt – yes, Meek-yes

Motion Carried to enter Executive Session at 11:07 a.m.

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

Motion: Vice Chair Weintraub moved to return to Open Session at **12:06 p.m.**

Second: Commissioner Lucas

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 one recusal on one case. She asked if there were any additional recusals and there were none.

Motion: Vice Chair Weintraub moved to authorize the Attorney General's Office to proceed with **Case No. CJ-2026-558** as discussed in Executive Session.

Second: Commissioner Wilt

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

Motion: Vice Chair Weintraub moved to dismiss **Complaint C-25-18** because there is not reasonable cause to believe a violation of the Ethics Rules has occurred.

Second: Commissioner Lucas

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

Motion Carried.

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

Second: Commissioner Lucas

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

Motion Carried.

Statement by Chair Meek: Chair Meek stated the Commission will not be taking any action today on the following case discussed in Executive Session, **Case No. 2026-13**

10. **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.

11. **Adjournment. Chair Meek**

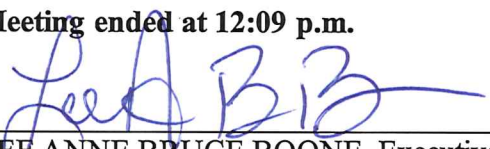
Motion: Commissioner Wilt moved to adjourn the meeting.

Second: Commissioner Lucas

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

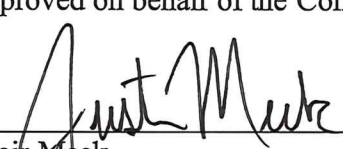
Motion Carried.

Meeting ended at 12:09 p.m.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



Chair Meek