

OKLAHOMA ETHICS COMMISSION

June 5, 2026

Special Meeting

1. Call to Order.

Chair Meek["Meek"] called to order the meeting of the Ethics Commission of the State of Oklahoma ["Commission"] on Friday, June 5, 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"], Administrative Programs Manager Darci Ray, and Legal Assistant La Shounda Faye and Compliance Specialist Aniston Emory.

Observing all or part of the meeting: Emma Rowland, The Oklahoman; Alexia Aston, The Oklahoman; Emma Murphy, Media; Courtney Bell, Media; Paige Taylor, Media; Travis Stewart, Media, Andrea Hancock, Media and Abi Lewis, Photographer.

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 May 14, 2026. [Chair Meek].**

Motion: Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on May 14, 2026.

Second: Commissioner Wilt

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

Motion Carried

6. **Consideration, discussion, and possible action regarding the rescission of Advisory Opinion 2019-01 (Cited as: 2019 OK Ethics 01), concerning Campaign Finance Rules 2.48 and 2.116, including the extension of mandatory dissolution deadlines and the establishment of mandatory dissolution dates for candidate committees. [Chair Meek].**

General Counsel Kerr explained that the Advisory Opinion, which was implemented in 2019, pertains to rules that have recently been amended, specifically Rules 2.116 and 2.48. The opinion addressed mandatory committee dissolution deadlines when a committee retained remaining funds and previously allowed for a 90-day extension. Because Rule 2.116 has since been amended to permit a one-year extension, the Advisory Opinion is no longer applicable and has effectively been superseded by the updated rule. General Counsel Kerr noted that the matter was being presented primarily as a housekeeping item for the Commission's discussion and consideration.

Motion: Commissioner Johnson moved to rescind Advisory Opinion 2019-01 concerning Campaign Finance Rules 2.48 and 2.116.

Second: Commissioner Lucas

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

Motion Carried

1. **Consideration and discussion and possible action regarding a proposed rule requiring disclosure of artificial intelligence generated political ads. [Chair Meek].**

Executive Director Bruce Boone provided an overview of discussions regarding political mailers distributed during the current election cycle, including mailers involving current officeholders who were not candidates. She noted that the Commission had previously requested additional research on the issue.

Executive Director Boone reported that the topic was discussed by the Advisory Group, which shared general perspectives on the use and disclosure of artificial intelligence (AI) in political

advertising. She provided background information on AI and discussed the evolving legal landscape surrounding AI-generated political content.

Executive Director Bruce Boone reviewed approaches taken by other states, noting that some states prohibit certain AI-generated political communications during specified periods before an election, while others require disclosures identifying AI-generated content and the entity responsible for the communication. She also summarized recent court decisions addressing AI-related election laws, emphasizing that judicial scrutiny has generally focused on restrictions on political speech rather than disclosure requirements.

Executive Director Bruce Boone stated that the Commission is not currently considering specific rule language. She noted that any future proposals would be developed through the Commission's rulemaking process and would be designed to promote transparency while minimizing burdens on protected political expression. Video examples of AI-generated political advertising from other states were presented for informational purposes.

Comment by Vice Chair Adam Weintraub commented that he was interested in learning more about Maryland's approach to regulating AI-generated political communications, noting that it appears to be strict on regulation. He stated that he continues to consider the issue and has not identified any positive applications of this type of technology within political campaigns. Also mentioned that he likes the sample language of requiring synthetic media to be disclosed. Stated that he is in favor of both statutory language and whatever rules the Commission can constitutionally enact.

Question by Chair Meek asked whether there have been any legal challenges in Maryland or other jurisdictions seeking a declaratory judgment regarding the propriety of imposing such limitations, and whether any courts have issued rulings addressing the legality of those restrictions.

Comment by Deputy Director Rogers responded that he was not aware of any legal challenges or court rulings addressing the issue.

Comment by Executive Director Bruce Boone stated that, to her knowledge, the lawsuits most cited involving challenges to election laws on First Amendment grounds have originated in California and Hawaii, where portions of those laws have been struck down. She further noted that the Commission could specifically research Maryland.

Comment by Chair Meek emphasized the importance of ensuring that the Commission's actions are consistent with applicable law. He stated that, while restrictions, limitations and rules are necessary, the Commission must ensure that any such measures are legally permissible and appropriately implemented.

Comment by Commissioner Johnson commented that, with respect to disclosure requirements, there must be a high degree of clarity. He emphasized that factors such as timing, font size, and presentation should ensure that disclosures are clearly visible and readily understandable.

Question by Chair Meek asked whether Maryland has implemented an outright ban on the practice in question.

Comment by Deputy Director Rogers stated that he could not recall at that moment whether Maryland had implemented an outright ban.

Comment by Vice Chair Weintraub noted that the Oklahoma Court of Criminal Appeals and the Oklahoma Supreme Court have not found anything inherently improper about the use of artificial intelligence and continue to refer to it as "generative artificial intelligence." He further stated that attorneys who utilize artificial intelligence remain responsible for the accuracy and content of any materials produced.

Comment by Executive Director Bruce Boone stated that, if the Commissioners wished to move forward with a recommendation for specific rule language, staff would work with the Legislature on the proposal. She noted that certain aspects of regulation would fall within the Legislature's authority, while other matters, such as disclosure requirements, would fall within the Commission's jurisdiction. She emphasized that the Commission and the Legislature could work collaboratively on their respective areas of authority.

Comment by Chair Meek stated that he would prefer the draft language to be as stringent, limiting, and prohibitive as possible.

Consideration, discussion, and possible action for Commissioner sponsor(s) and authorization for staff to begin the rulemaking process regarding the rulemaking request presented today. Chair Meek

Motion: Vice Chair Weintraub moved to begin the rulemaking process for the proposed rule changes submitted by staff.

Second: Commissioner Wilt

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

Motion Carried.

7. Executive Director's Report

a. Briefing and discussion regarding Request for Advisory Opinion

Executive Director Bruce Boone reported that the Commission recently received a request for an Advisory Opinion on how Oklahoma campaign finance rules apply to a federally registered independent-expenditure-only committee seeking to participate in Oklahoma elections.

The request asks the Commission to consider what registration, and organizational requirements should apply to an out-of-state committee. The request arrived only

days earlier, and no legal or policy analysis has been completed. Boone stated the discussion's purpose was simply to inform the Commission of the pending inquiry.

b. Budget Report

Executive Director Bruce Boone reported that the Commission's budget remains in a strong, stable position. She noted that technology continues to represent the Commission's largest strategic investment area with the Commission's revolving funds providing flexibility to support technology and transparency initiatives. As the fiscal year approaches, the Commission is reviewing available funds and identifying one-time investments that align with strategic plan priorities, including public education, outreach, and technology infrastructure.

c. Compliance Report

Executive Director Bruce Boone reported that compliance rates remain strong, with 98% of lobbyist reports and 94% of state committee reports filed on time, reflecting continued engagement and ongoing educational efforts.

The monthly compliance tracker include data from the Local Campaign Finance Transparency Portal, which serves as an interim filing option for political subdivisions. The Commission achieved 100% compliance for Personal Financial Disclosures (PFDs), clarifying that this figure reflects statewide filings and does not include local filings. 394 PFD's were filed through the Guardian system and 832 PFDs were filed through the Local Campaign Finance Transparency Portal.

The Executive Director further highlighted outreach efforts, including a compliance officer's after-hours training session in Midwest City on local campaign filing procedures. She noted that the session was well received and contributed to strengthening public trust in the Commission.

d. Guadian and Political Subdivision Update

Executive Director Bruce Boone reported that the Guardian system is functioning well and is available to all political subdivisions, although fewer than 40 local filers have registered to date. The Commission met its implementation deadline and internal administrative capabilities for local filings are nearing completion. The Commission has initiated outreach efforts to county and school board candidates and officeholders and plans to begin outreach to municipalities once additional information becomes available. She noted that, while there may be up to 3,000 potential local filers statewide, the Commission cannot determine how many will meet the current \$1,000 reporting threshold, and, therefore, would not be required to register. The Executive Director further noted that a reduction in the reporting threshold as discussed during the last meeting could significantly increase the number of filers.

e. Campaign Advertisement Spending (AdImpact)

Deputy Director Rogers provided an overview of the latest AdImpact data and demonstrated updates to the platform. He explained that AdImpact compiles real-

time information on campaign advertising expenditures across broadcast television, cable television, digital television, connected television (CTV), radio, and satellite media. From January 2025 through May 31, 2026, approximately \$59.5 million had been spent on campaign advertising in Oklahoma. He also reviewed spending data by race, including the top expenditures in the gubernatorial race, which totaled nearly \$35 million as of that date. He noted that this information is available on the Commission's social media platforms and the Ethics website

f. PSA Campaign

Executive Director Bruce Boone provided an update on the Commission's public service announcement campaign with Candor and the Oklahoma Association of Broadcasters, which is intended to promote transparency and encourage voters to access information about candidates, campaign supporters, and election activity through the Commission's website. The public service announcements are being distributed through television and radio outlets and may be seen or heard throughout the state.

The Commission has developed a marketing campaign to support outreach efforts to local political subdivision officeholders, candidates, and school board campaigns and voters throughout the state. These efforts include social media campaigns, marketing advertisements, television, and radio outreach, and are intended to maximize awareness and participation among potential filers. Executive Director further reported that the Commission is making updates to the Ethics Commission website to improve navigation and access to the Guardian system. The Commission will monitor website traffic and call volume to evaluate the effectiveness of the outreach and communication efforts.

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; and for the purpose of discussing the employment, hiring, appointment, promotion, demotion, disciplining of annual employment evaluation of leadership and staff. 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-26-06

C-26-08
C-26-10
C-26-11
C-26-12
C-26-13

- iv. Evaluation and discussion of salaried positions and performance reviews of staff leadership.

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 9.

Second: Commissioner Lucas

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

Motion Carried to enter Executive Session at 10:55 a.m.

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

Motion: Commissioner Johnson moved to return to Open Session at 12:21 p.m.

Second: Commissioner Lucas

Roll Call Vote: Wilt– yes, Weintraub – yes, Lucas– yes, Johnson – 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 on anything discussed in Executive Session or any Motions to recuse, and there were none.

Motion: Commissioner Wilt moved to dismiss **Case No. 2025-20** as there is not reasonable cause to believe that violations of the Ethics Rules have occurred based on the evidence obtained.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved pursuant to Ethics Rule 6.10, to authorize the Executive Director to prosecute the Respondent in **Case No. 2026-09** in District Court also moved pursuant to Ethics Rule 6.9, to authorize the Executive Director to release a public statement as discussed in executive session.

Second: Commissioner Lucas

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

Motion Carried.

Motion: Vice Chair Weintraub moved pursuant to Ethics Rule 6.9, to authorize the Executive Director to release the public statement as discussed in Executive Session in **Case No. 2026-13**.

Second: Commissioner Wilt

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

Motion Carried.

Motion: Commissioner Wilt moved pursuant to Ethics Rule 6.7, to open a formal investigation into **Complaint C-26-14**, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred.

Second: Vice Chair Weintraub

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

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: **Complaints C-26-15 and C-26-16**.

9. **Resolution honoring service of outgoing Commissioner Johnson. Chair Meek and Executive Director Bruce Boone.**

Executive Director Bruce Boone recognized Commissioner Howard Johnson for his dedicated service to the Oklahoma Ethics Commission and his longstanding commitment to education and public service. She thanked him for his leadership, integrity, and many contributions during his five-year term.

Commissioner Johnson reflected on voting in favor of State Question 627 in 1990, which established the Oklahoma Ethics Commission, and remarked that he never imagined he would one day have the privilege of serving as a Commissioner. He expressed that the greatest reward of his service had been working alongside his fellow Commissioners and described it as an honor to serve.

Commissioner Johnson stated that he approached his role with a commitment to fairly and impartially "call balls and strikes," and expressed appreciation for the Commission's thoughtful, problem-solving approach to its work and for the press's objective coverage of Commission meetings.

Commissioner Johnson also reflected that one of the Commission's most significant accomplishments during his tenure was the appointment of Executive Director Lee Anne Bruce Boone. He commended her leadership and the strong staff she has assembled, and concluded by expressing his gratitude to his fellow Commissioners and Commission staff for the opportunity to serve.

10. Adjournment. Chair Meek

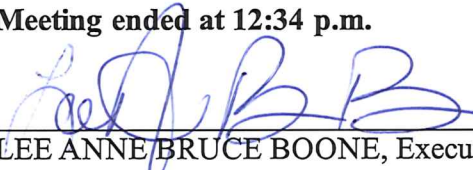
Motion: Commissioner Johnson moved to adjourn the meeting.

Second: Commissioner Wilt

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

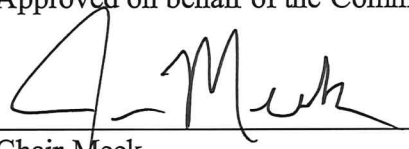
Motion Carried.

Meeting ended at 12:34 p.m.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



Chair Meek