

## OKLAHOMA ETHICS COMMISSION

May 14, 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, May 14, 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 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”], Compliance Officer Tyler Fixley, and Assistant Compliance Officer and Assistant Compliance Officer Aniston Emory.

**Observing all or part of the meeting:** Jonathan Wilk, State Representative; Andrew Bates, Senator Kirt Intern; Emma Murphy, Media; Hunter Zearley, Candidate for Senate District 18; Andrea Hancock, Media; H.J. Reed, OKSPA; Charles Outlaw, Spectator; Joseph Pierce, Senate; and Rachel Morse, State Representative Office.

#### 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 April 9, 2026. [Chair Meek].**

**Motion:** Commissioner Wilt moved to approve the minutes for the regular meeting and executive session held on April 9, 2026.

**Second:** Commissioner Johnson

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

**Motion Carried**

6. **Consideration, discussion, and possible action to withdraw newly promulgated ERA 5.3 and ERA 5.5 after having been presented to each house of the Legislature and the Governor, and prior to becoming effective in accordance with Okla. Const. art. XXXIX, § 3 and as authorized by 2008 OK AG 17. [Chair Meek].**

Executive Director Bruce Boone provided context regarding Senate Bill 2180 and explained the requirement is similar to provisions contained in the proposed Ethics Rules ERA 5.3 and ERA 5.5, which would require comparable disclosures for lobbyists.

Executive Director Bruce Boone that the Commission does not wish to create duplicative work for individuals required to file disclosures, and although the bill was recently signed by the Governor, the Commission still has time to withdraw the proposed rules to avoid duplicate filing requirements with both the Secretary of State and the Commission.

Comment by Chair Meek commented that, to simplify the matter, the Legislature had essentially done what the Commission was going to do through the proposed rules.

Comment from Executive Director, Bruce Boone confirmed and explained that there has been significant interest regarding foreign governments and the type of influence they may have, and she'd worked with Senator Daniels regarding the bill and informed her that the Commission had a similar proposal under consideration and that the Commission could consider withdrawing its proposed rules if the bill passed.

Question by Commissioner Johnson asked whether the June 11 deadline would provide the Commission with enough time to act?

Comment by Executive Director Bruce Boone responded that unless action is taken by the Legislature or the Governor, the Ethics Rules would become effective at sine die.

**Motion:** Vice Chair Weintraub moved to withdraw ERA 5.5 and ERA 5.3 as they have not yet become effective in accordance with Okla. Const. art. XXIX, § 3 and 2008 OK AG 17.

**Second:** Commissioner Johnson

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

**Motion Carried**

7. **Consideration and discussion and possible action to change the date of the June regularly scheduled meeting, currently scheduled for June 11, 2026. [Chair Meek].**

Chair Meek indicated he would be unavailable June 11th but is comfortable with Vice Chair presiding over the meeting or, alternatively, moving the meeting to another proposed date.

General Counsel Kerr advised that the Commission would not need to vote to schedule a special meeting, as that action could occur at a later time.

**No Action Taken.**

8. **Introduction and explanation of a rulemaking request by Representative Jonathan Wilk regarding the review of committee loans at a specific threshold. [Chair Meek].**

Representative Wilk presented a proposed rule requiring Commission review when a candidate loans or gifts \$100,000 or more to their own campaign committee, ensuring verification that the money truly originates from the candidate.

Vice Chair Weintraub asked why the threshold was set at \$100,000. Representative Wilk stated that the amount approximates a House member's two-year salary and is intended to flag unusually large personal contributions that raise questions about the true source of funds. Representative Wilk advised that the concern arises when candidates contribute very large sums—such as \$400,000—to campaigns for offices with comparatively low salaries, prompting scrutiny about whether the funds are genuinely personal.

Commissioners discussed the proposal's purpose, including increasing transparency when candidates contribute substantial amounts to their own campaigns. General Counsel Kerr noted that candidate loans can also raise compliance concerns regarding repayment deadlines and whether transactions are properly characterized as loans or contributions. Executive Director Boone thanked Representative Wilk for collaborating with the Commission. Commissioners generally expressed support for measures that enhance transparency in campaign finance reporting.

**Motion:** Vice Chair Weintraub moved, to begin the rulemaking process for the proposed rule changes submitted by Representative Wilk.

**Second:** Commissioner Johnson

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

**Motion Carried.**

9. **Consideration, discussion, and possible action regarding the possible executive of a Public Education Partnership Contract with the Oklahoma Association of Broadcasters to produce, market, and distribute a Public Service Announcement for Oklahomans regarding the mission of the Commission [Chair Meek].**

Executive Director Bruce Boone discussed potential use of available budget funds resulting from staff vacancies and hiring delays. She informed the Commission that, based on discussions with ethics agencies in other states, public education and outreach are important components of an agency's mission. She presented an opportunity to partner with the Oklahoma Association of Broadcasters to develop and distribute a statewide public service announcement campaign designed to increase public awareness of the Ethics Commission, campaign finance transparency, and the Commission's role.

Executive Director Boone explained that the campaign could include both radio and television advertisements, with production costs included, and estimated that a 12-month campaign would cost approximately \$80,000. She also noted that the campaign could potentially be expanded in the future to support outreach and education efforts related to political subdivision filers. Commissioners discussed the proposal, including anticipated costs, advertising placement, and the potential impact on agency workload. Commissioners expressed support for efforts that increase public awareness and promote transparency.

**Motion:** Vice Chair Weintraub moved, to approve the Public Education Partnership Contract with the Oklahoma Association Broadcasters as presented by Executive Director Bruce Boone for a 12-month term.

**Second:** Commissioner Johnson

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

**Motion Carried**

10. **Introduction and explanation regarding assistance in distribution of remaining funds and dissolution of the candidate committee account of former sheriff, Chris Amason [Chair Meek].**

Executive Director Bruce Boone mentioned that she has received several inquiries regarding former Sheriff Chris Amason's candidate committee depository account. She stated that General Counsel Kerr has reached out to the committee's treasurer and, unsurprisingly, very little funding remains in the account.

Question from Chair Meek asked where remaining funds go once accounts are dissolved in situations such as this?

Comment by Executive Director Bruce Boone explained that the remaining funds may be distributed to various sources depending on the amount remaining.

Comment by General Counsel Kerr stated that Rule 2.48 addresses surplus funds.

Question by Commissioner Johnson asked whether the candidate would be allowed to decide where the remaining funds go?

Comment by General Counsel Kerr responded that the candidate may do so, as long as the selected recipient is included on the approved list.

## 11. **Executive Director's Report**

### **a. Budget Update**

Executive Director Boone reported that the Commission's financial position remains consistent with the prior month, with anticipated unspent funds remaining based on current percentages. She noted that Fund 195 (General Appropriations) requires close monitoring to ensure funds are fully expended by the end of the fiscal year. The Guardian replacement funds remain unchanged pending resolution of ongoing litigation and future system replacement needs. Fund 200 has increased slightly due to timing differences in the transition from the Guardian system and higher revenues received earlier in the fiscal year. The Commission has transferred over \$40,000 to the General Revenue Fund through April 2026 and expects that amount to increase to nearly \$100,000 in the coming months.

### **b. Legislative Update**

Executive Director Bruce Boone reported that legislation increasing the Commission's limits bill from \$150,000 to \$250,000 was approved by both chambers of the Legislature. The Governor allowed the bill to become law without signature. In recent years, the Commission has typically had approximately \$150,000 in excess funds that can now be utilized under the increased limit. The new limit will take effect in July.

Executive Director Bruce Boone also discussed Senate Bill 1433, the Guidance Transparency Act, which requires certain state agencies to make guidance documents available for public inspection. Staff will conduct a comprehensive review to determine whether additional materials must be made available. Senate Bill 1433 becomes effective in November, providing time for further evaluation.

### **c. Compliance Update**

Executive Director Bruce Boone reported that the assignment of political subdivisions and districts has increased compliance-related activity, resulting in higher volumes of phone calls, emails, and outreach efforts. During April, Commission staff screened approximately 1,000 submissions through the interim Local Transparency Portal, including Statements of Organization and Personal Financial Disclosure filings.

Executive Director Boone further reported that more than 95% of Personal Financial Disclosure statements had been filed ahead of May 15, 2026. Only 13 filings remained outstanding, including those of several judges and elected officials. She noted that the Commission is striving to achieve a 100% filing rate, consistent with last year's results.

Question by Commissioner Johnson, does this include municipalities?

Comment by Executive Director Bruce Boone noted that while the individuals in question are required to file Personal Financial Disclosure (PFD) statements, many are not currently listed in the Guardian system. As a result, the Commission has conducted limited outreach to those filers. She further reported that approximately 300 PFDs had been filed within the previous few days through.

**d. Technology-Assisted Campaign Finance Report Review Procedures, including compliance officer verification and quality assurance sampling measures.**

Executive Director Bruce Boone reported that, with the addition of political subdivisions to the Commission's oversight responsibilities, she has been evaluating the most effective ways to manage the increased workload. She stated that she reached out to the Commission's Chief Information Officer (CIO) to explore technology-based solutions that could assist with routine compliance tasks, particularly the review of campaign finance reports.

Executive Director Bruce Boone noted that staff were enthusiastic about the possibilities presented by the technology. Within a week of the initial discussions, a demonstration program was developed for review. She provided an overview of the proposed system, which would be designed and implemented by the Oklahoma Office of Management and Enterprise Services (OMES). The project would involve both an initial implementation cost and ongoing monthly fees.

She emphasized that the technology would not replace staff review completely but would serve as a first-tier screening tool to assist with campaign report reviews. Commission staff would continue to conduct oversight by reviewing approximately 10 percent of reports to ensure accuracy and monitor for any inconsistencies or drift in the automated review process.

Question by Commissioner Johnson asked whether they gave a ballpark figure.

Comment by Executive Director Bruce Boone mentioned that it is way less than \$100,000 dollars and a nominal fee of a few thousand a month. This would be less than a salary and free up time for the compliance officers to do more outreach. Mentioned this is moving in the right direction but still have a lot of homework to do.

**e. Guardian Update**

Executive Director Bruce Boone reported that political subdivisions have been integrated into the Guardian system and that the system is functioning as intended. The Commission is now able to add counties, as well as additional municipalities and school boards; however, staff are awaiting further information regarding office terms in order to properly assign reporting calendars.

She noted that staff have matched available records as much as possible through automated processes and are now following up via email and phone calls to complete remaining entries. Counties are being contacted to inform them that they may now file through the Guardian system. She further stated that a phased rollout approach has been maintained and that municipalities and school boards are expected to be added in the near future.

Executive Director Boone also reported that Civics remains on schedule and is currently in Phase 2 of implementation, which focuses on administrative functions.

Question by Commissioner Wilt inquired about whether staff are contacting individual candidates directly.

Comment by Executive Director Bruce Boone confirmed that staff are actively contacting individual candidates and described the effort as substantial, requiring temporary staffing support. She noted that although the requirement is longstanding, awareness has been limited, prompting proactive outreach.

**f. Political Subdivision Update**

Executive Director Bruce Boone reported that the Commissioners previously approved of a marketing campaign last year; however, implementation was placed on hold due to the delay in integrating political subdivisions. She stated that the campaign is now ready to proceed and will include both television and radio advertisements. She noted that the public may begin seeing and hearing these ads as early as June.

**g. Partnership with OMES for conflict-of-interest training required by HB 2164 (2025)**

Executive Director Bruce Boone reported that House Bill 2164, enacted last year, will take effect in January and is intended to enhance transparency and accountability. The law requires new state officers to complete conflict-of-interest training within one year of taking office.

She also provided an update on the Commission's partnership with OMES to develop a virtual training course based on Commission materials. The course will include knowledge checks and a certificate of completion and is expected to be

available by the end of the year. The training will be free and open to all state employees. Work on the project is expected to begin in July.

Question by Commissioner Johnson asked does this apply to unpaid positions?

Comment by Executive Director Bruce Boone responded that it does.

Question by Commissioner Wilt asked whether participants would be required to achieve a specific score to pass the course.

Comment by Executive Director Bruce Boone confirmed that a passing percentage will be required. She added that a recommended threshold will be established and that the training is intended to be interactive in nature.

Question by Commissioner Wilt asked about the length of the training video?

Comment by Executive Director Bruce Boone responded that it would be approximately 40-50 minutes.

Comment by Deputy Director Rogers added that the training will be self-paced.

Comment by General Counsel Kerr noted that in-person training will still be available as an option.

Question by Chair Meek asked about the consequences for not completing the training.

Comment by Executive Director Bruce Boone stated that the legislation provides that individuals who do not complete the required training within one year will be removed from office.

12. 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 Johnson moved to enter closed executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 12.

**Second:** Commissioner Wilt

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

**Motion Carried to enter Executive Session at 11:15 a.m.**

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

**Motion:** Vice Chair Weintraub moved to return to Open Session at **1:55 p.m.**

**Second:** Commissioner Johnson

**Roll Call Vote:** Johnson– yes, Wilt – yes, Weintraub – 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 accept the settlement offered by the Respondent in **Case 2024-29**; as discussed in Executive Session.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Commissioner Weintraub moved to Dismiss **Complaint C-26-06** because there is not reasonable cause to believe that violations of the Ethics Rules have occurred.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved to Issue a public statement under Ethics Rule 6.7 regarding **Complaint C-26-08** as discussed in Executive Session.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved to dismiss Complaint C-26-10, because there is not reasonable cause to believe that violations of the Ethics Rules as currently written have occurred and that the Commission explore a rule change.

**Second:** Commissioner Wilt

**Roll Call Vote:** Johnson-yes, Wilt-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-26-11, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred.

**Second:** Commissioner Wilt

**Roll Call Vote:** Johnson-yes, Wilt-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-26-13, based on a reasonable cause to believe that one or more violations of Ethics Rules have occurred

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Motion:** Vice Chair Weintraub moved for the Executive Director to proceed to implement the salary plan for the next fiscal year as discussed in Executive Session.

**Second:** Commissioner Wilt

**Roll Call Vote:** 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 complaint discussed in Executive Session: Complaint C-26-12 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

13. **Adjournment. Chair Meek**

**Motion:** Chair Meek moved to adjourn the meeting.

**Second:** Commissioner Wilt

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

**Motion Carried.**

**Meeting ended at 1:35 p.m.**

  
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LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

  
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Chair Meek