Publication of Information in the Public Interest

Public Reprimand Related to Case No. 2026-13

Ethic Rule 6.9 Confidentiality of Complaint or Investigation.

> "Unless the Commission determines that a complaint or a formal investigation should be made public, all complaints and formal investigations, including documents and discussions in executive session, shall remain confidential and shall not be disclosed[.] ... The Commission may make a complaint or formal investigation and any documents relating thereto public at any time it deems release of that information to be in the public interest."

At the November 12, 2026, Ethics Commission Meeting, the Commission determined that the following Public Reprimand related to Case No. 2026-13 was necessary for the purpose of public transparency and education:

The Ethics Commission has completed its investigation into RoadToVictory2026.com, formerly operated by MOGANetwork, LLC, and the individuals involved in the scheme: Claire Kennedy, Narcisa Crafts, and Lynelle Medley (e.g., collectively "Respondents").

The Commission determined the website solicited campaign contributions by offering contributors the opportunity to win a cruise valued at approximately $1,500. The Commission further determined Respondents attempted to provide in-kind contributions to political candidates through free advertising on the website. Such contributions are subject to the reporting and contribution limitations contained in Ethics Rule 2.

Contrary to the Respondents' assertions, the Commission determined that these activities fall squarely within its jurisdiction because they involve campaign contributions, campaign expenditures, and related campaign finance activity governed by Ethics Rule 2. The Commission's findings are based on the nature of the conduct at issue, not on how the Respondents chose to characterize that conduct.

The Commission further determined that the use of prizes, raffles, giveaways, or similar inducements to obtain campaign contributions is not authorized by Rule 2.63. Persons contemplating similar campaign fundraising schemes should not proceed unless compliance with all applicable Oklahoma law has been independently verified.

The Commission recognizes that the website has since been taken offline. However, that action occurred only after the matter was brought to the Commission's attention through external complaints. The Commission's early intervention prevented the continuation of activity that raised significant legal concerns and could have exposed participants to additional civil and criminal consequences under Oklahoma law.

The Commission expects individuals and entities engaged in campaign fundraising to understand and comply with Oklahoma campaign finance requirements before soliciting contributions, not after regulatory intervention occurs. This matter serves as a reminder that ignorance of campaign finance requirements does not exempt any person from compliance with Oklahoma law.