



Publication of Information in the Public Interest Related to Case No. 2024-32

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 by a Commissioner, by the Commission or by its employees except to the extent necessary to facilitate or conduct a preliminary inquiry or a formal investigation. However, the Executive Director may confirm or deny the existence of a complaint or formal investigation alleging a violation of these Rules by any individual upon the written request of that individual. A settlement agreement executed under these Rules shall be public record. 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 January 15, 2026, Ethics Commission Meeting, the Commission determined that release of the following information related to Case 2024-32 was in the public interest.

The Oklahoma Ethics Commission has approved a settlement resolving Ethics Commission Case No. 2024-32 involving a former state employee.

Following investigation, the Commission determined that no violation of Ethics Rule 4 (Conflict of Interest) occurred. As is often the case in ethics investigations, the review of the underlying facts identified other compliance issues, including concerns related to unregistered lobbying activity. Specifically, the respondent engaged in communications with state officials for the purpose of influencing governmental action while not registered as a lobbyist, as required under Ethics Rule 5, which governs lobbyist registration and reporting requirements.

Ethics Rule 5 exists to ensure transparency in the lobbying process and fairness for those who comply with the law. When individuals engage in lobbying activity without registering, it places those who follow the rules at a disadvantage and undermines public confidence in government. This case reinforces the importance of compliance to protect the integrity of the system. As the State prepares to enter another legislative session—when lobbying activity naturally increases—this settlement serves as an important reminder that lobbyist registration and reporting requirements apply to everyone.

Under the terms of the settlement, the respondent will pay a \$2,500 civil penalty to the State of Oklahoma related to violations of Ethics Rule 5 and will provide proof of payment to the Commission. The settlement was approved by the Commission at a public meeting and resolves all matters identified in the Notice of Allegations.