



Publication of Information in the Public Interest

Related to Case 2026-19

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 October 8, 2026, Ethics Commission Meeting, the Commission determined that the following information relative to Case 2026-19 was necessary for the purpose of public transparency and education:

Pursuant to Rule 6.9 of the Oklahoma Ethics Rules, the Oklahoma Ethics Commission voted unanimously at its October 8th meeting to release certain records related to the ongoing investigation of Representative Danny Williams, House District 28, finding that public release of these materials serves the public's best interest. The Notice of Allegations has previously been provided to the Respondent, and the Commission has authorized its release. In accordance with Rule 6.10, the Respondent retains the right to submit a written response to the Allegations, may request additional time to respond, and may request an opportunity to provide an oral response before the Commission. After receipt of any response—or failure to submit one—the Commission may pursue a settlement or determine that the matter should be filed in District Court.

The Oklahoma Ethics Commission issues this public statement to provide transparency regarding matters involving Representative Danny Williams and to summarize the nature of the allegations currently under investigation. Although the investigation remains ongoing, the Commission finds that the public has a significant interest in understanding the concerns that have arisen and the Commission's findings to date.

The Commission has identified substantial evidence suggesting that Representative Williams used the privileges and authority of his office in ways that may have improperly advanced his personal, financial, or organizational interests. The conduct at issue includes actions affecting the distribution and oversight of state-issued grant funds, involvement in official matters relating to entities with which he maintained personal or professional connections, and the use of state resources or personnel in support of such activities.

The Commission's preliminary findings indicate that organizations founded, chaired, or otherwise associated with Representative Williams stood to benefit from his official actions.

Evidence also indicates that Representative Williams arranged or facilitated official interactions with state agencies concerning services offered by companies in which he had an interest or affiliation. These actions reflect the potential use of public office to influence governmental processes for private advantage.

Based on this conduct, the Commission has identified substantial evidence of violations of Rule 4, including:

• **Rule 4.4 – Misuse of Office** • **Rule 4.5 – Misuse of Authority** • **Rule 4.7 – Conflicts of Interest**

Additionally, during the course of this investigation, Representative Williams has not been forthright with the Commission. His lack of candor has hindered the Commission's ability to obtain timely and complete information as required under the Ethics Rules.

The Commission will continue to evaluate the matter in accordance with its constitutional and statutory responsibilities. Additional information will be released as permitted by the Oklahoma Ethics Rules.



October 8, 2026

Via Email [REDACTED]@gablelaw.com

Representative Danny Williams
c/o David R. Herber
499 W. Sheridan Ave., Ste. 2200
Oklahoma City, OK 73102

RE: **Notice of Allegations of Ethics Rules Violation, Rule 4 Conflicts of Interest**
Case No. 2026-19, In the Matter of Danny Williams

Dear Representative Danny Williams:

At its meetings on August 13, 2026, the Oklahoma Ethics Commission ("Commission") determined there was reasonable cause to believe that violations of one or more provisions under Conflicts of Interest, Rule 4, may have occurred, and pursuant to Ethics Rule 6.7, authorized a formal investigation into the activities of Representative Danny Williams ("Williams"). This Notice relates to information critical to a confidential, constitutionally required investigation into alleged violations of the Ethics Rules. Okla. Const. art. 29, § 4.

You have an opportunity to respond to these allegations in writing no later than 20 days from the date of this Notice. The response to the allegations provided in this Notice should include any documents supporting the response to the allegations. Supporting documentation provided to the Commission in the response may result in the removal and/or modification of some or all of the facts and/or allegations. You may seek the advice of an attorney in responding to this Notice. Any attorney representing the Respondent in this matter must submit a letter of representation to the Commission at the address listed below in advance of, or in conjunction with, the response to this Notice.

You may request to appear before the Commission to respond orally to the allegations, so long as ***you or your representative actually appear before the Commission within the time frame provided herein for filing the written response.*** Ethics Rule 6.10. Respondents seeking to respond by oral presentation to the Commission are responsible for being aware of the date and time of Commission meetings in order to appear timely. Any requests for additional time to respond to the allegations beyond the first request for an extension are at the exclusive discretion of the Commission, not Commission staff, to grant. ***Failure to respond to the allegations herein shall be deemed as an admission to the allegations.*** Ethics Rule 6.10.

Submit the written response to the Oklahoma Ethics Commission by email, USPS or by hand-delivery to the Commission office no later than 4:30 p.m. of the date of the deadline provided herein for the response:

Oklahoma Ethics Commission
Attn: Margaret C. Kerr, General Counsel
State Capitol, 2300 N. Lincoln Blvd., Room G-27
Oklahoma City, OK 73105
Email: margaret.kerr@ethics.ok.gov

To review the Oklahoma Ethics Commission laws and rules, as well as the Enforcement and Compliance Guide, visit the Commission website at <https://www.ok.gov/ethics/>.

After the time for a response to these allegations has passed, the Commission may take action as provided in the Constitution and laws of the State of Oklahoma, including but not limited to prosecution of a civil lawsuit. Monetary penalties and other remedies that may be ordered by the District Court for violation of the Ethics Rules are provided in Ethics Rule 6.

Please be advised that this Notice only includes alleged violations of the Ethics Rules. It neither includes nor considers any allegations of violations of the criminal code or other laws.

I. FACTS

1. The Oklahoma Education Commission (OEC) was established by statute, 70 O.S. §14-201, on 11/01/2022.
 2. The purpose of OEC was to research, evaluate and share information to conduct a study on how to improve the quality of instruction and learning through distance and remote modalities.
 3. Williams is or was the Chairman of the Oklahoma Education Commission.
 4. Oklahoma Education Commission, Inc. (OEC, Inc.) is a non-profit, charitable organization registered with the Secretary of State and established 03/29/2025.
 5. OEC, Inc. obtained its public charity status from the IRS on 06/18/2025.
 6. Williams engaged in fund-raising for OEC, Inc. for the purpose of funding the AI Symposiums.
 7. Williams received benefits from OEC, Inc. including transportation and lodging at host hotels/casinos for the OEC, Inc.'s AI Symposiums.
 8. Williams represented himself as holding a leadership role for OEC, Inc. in communications with possible donors and speakers.
 9. Williams used his office, authority, position, and state resources to fundraise for OEC, Inc.
 10. [REDACTED] a for-profit corporation, does business under the Trade Name of [REDACTED]).
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11. Williams has endorsed [REDACTED] including at a sales presentation at the Executive Offices of the Department of Corrections on or about [REDACTED] 2026.
 12. Williams used his office, position and title for the benefit of [REDACTED] including assisting with [REDACTED]
 - a.) contracts and legal documents, such as its Reseller Agreement;
 - b.) onboarding of new medical providers;
 - c.) Practitioner Agreements;
 - d.) sales and marketing materials;
 - e.) connection to the Health Information Exchange; and
 - f.) Business Associate Agreements.
 13. Williams engaged in email communications indicating he has assisted [REDACTED] in finding resellers, securing reseller agreements, and/or is a reseller.
 14. Williams has communicated with [REDACTED], the CEO of [REDACTED] 44 times in the last two years, including discussions of business development, sales activities and marketing materials.
 15. Williams assisted [REDACTED] in selling its product to the Seminole County Jail.
 16. Williams assisted [REDACTED] in billing his non-profit, House of Hope (see below) and [REDACTED], a private health care facility.
 17. Williams submitted orders for [REDACTED] to clients/customers using its product, as if Williams owned or had an interest in [REDACTED].
 18. [REDACTED] is a for-profit corporation established [REDACTED]/2024.
 19. Williams is the Manager, Chief Mental Health Officer, and member of [REDACTED]
[REDACTED]
 20. Williams' membership interest in [REDACTED] is 14.29%.
 21. [REDACTED] pays and/or has paid to [REDACTED] a commission/share(s) of profits.
 22. [REDACTED] Williams a/k/a [REDACTED] Williams is a relative of Williams.
 23. [REDACTED] Williams a/k/a [REDACTED] Williams works for and/or otherwise represents [REDACTED].
 24. [REDACTED] Williams a/k/a [REDACTED] Williams participated in the sales presentation at the Department of Corrections on or about [REDACTED] 2026.
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25. Seminole County House of Hope is a non-profit corporation.
26. Williams is the Chairman of the Board of House of Hope.
27. House of Hope has received funding from the State of Oklahoma Mental Health Grant.
28. Williams installed [REDACTED] products at House of Hope.
29. [REDACTED] has received grant money from the Department of Mental Health, to pay for products and services including at House of Hope.
30. Williams directed grant money from the Seminole and Hughes Counties Mental Health Grants to [REDACTED].
31. Williams submitted a Cash Voucher Claim to Seminole County grant funds to be used for payment to [REDACTED] for services provided at the [REDACTED], a private health care facility.

II. APPLICABLE LAW

In accordance with the Ethics Commission's investigation, below are the Ethics Rule(s) that apply to this matter.

32. Rule 4.4, Misuse of Office

Except as permitted by law or these Rules, a state officer or employee shall not use his or her State office

- (1) for his or her own private gain,
- (2) for the endorsement of any product, service or enterprise,
- (3) for the private gain of a family member or persons with whom the state officer or employee is affiliated in a nongovernmental capacity, including nonprofit organizations of which the state officer or employee is an officer or member, or
- (4) for the private gain of persons with whom the state officer or employee seeks employment or business relations.

These prohibitions shall not apply to any act or endorsement if the act or endorsement is customary for the state officer or employee's position or is authorized or permitted by the state officer or employee's contract of employment or if otherwise permitted or authorized by the Constitution or statutes or by these Rules. A state officer or employee may promote or solicit funds for civic, community or charitable organizations, including those promoting businesses or industries, or civic, community or charitable fund-raising events provided the state officer or state employee receives nothing for doing so except the costs associated with the state officer or state employee's participation in a fund-raising promotion or event paid for from funds of a charitable organization. No individual or other entity may pay for, or reimburse the charitable organization for, any such costs and gratuities; provided, however, nothing shall prevent individuals or other entities from making customary donations or paying sponsorship fees to the charitable organization.

33. Rule 4.5 Misuse of Authority.

A state officer or employee shall not use or permit the use of his or her office or title or any authority associated with his or her state office, or a state office to which he or she has been elected, in a manner that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to himself or herself or to his or her family members or persons with whom the state officer or employee is affiliated in a nongovernmental capacity, except to the extent otherwise permitted or authorized by the Constitution or statutes or by these Rules.

34. Rule 4.7 State Officer Impartiality.

In the event a state officer or employee: (1) knows that a particular matter involving specific parties is likely to have a direct and predictable effect on the material financial interests of the state officer or employee or of his or her family member; or (2) knows that a person with whom he or she has a business relationship other than a routine consumer transaction is a party to or represents a party to such matter; or (3) determines that the circumstances would cause a reasonable person with knowledge of the relevant facts to question his or her impartiality in the matter; the state officer or employee shall not participate in the matter unless he or she is required to do so by law or permitted to do so by these Rules.

[Only part of Rule 4.7 is stated above]

III. ALLEGATIONS

These allegations are based on the Commission's knowledge at this point in the investigation. Allegations may be removed or added as information becomes available. Additional allegations will result in supplemental notice(s) of allegations.

35. Paragraphs 1-34 are incorporated herein by reference.
 36. Williams used his state office to endorse a product, service or enterprise in violation of Rule 4.4.
 37. Williams used his state office for the private gain of a family member in violation of Rule 4.4.
 38. Williams used his state office for the private gain of persons with whom the state officer is affiliated in a nongovernmental capacity, including nonprofit organizations of which the state officer is an officer or member, in violation of Rule 4.4.
 39. Williams used his state office for the private gain of persons with whom the state officer seeks business relations in violation of Rule 4.4.
 40. Williams used his office, title and authority associated with his state office to which he has been elected, in a manner that is intended to coerce or induce another person, including a
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subordinate, to provide any benefit, financial or otherwise, to himself, in violation of Rule 4.5.

41. Williams used his office, title and authority associated with his state office to which he has been elected, in a manner that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to his family member, in violation of Rule 4.5.
42. Williams used his office, title and authority associated with his state office to which he has been elected, in a manner that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to persons with whom the state officer is affiliated in a nongovernmental capacity in violation of Rule 4.5.
43. Williams has participated in matters related to House of Hope, which would cause a reasonable person to question his impartiality in violation of Rule 4.7.
44. Williams has participated in matters related to [REDACTED], which would cause a reasonable person with knowledge of the relevant facts to question his impartiality in violation of Rule 4.7.
45. Williams has participated in fundraising, promoting and other matters related to OEC, Inc., which would cause a reasonable person with knowledge of the relevant facts to question his impartiality in violation of Rule 4.7.
46. Williams has participated in matters in which his family member has an interest, which would cause a reasonable person with knowledge of the relevant facts to question his impartiality in violation of Rule 4.7.

Respectfully,

[/s/ Margaret C. Kerr](#)

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