

Lobbying Guide



OKLAHOMA
Ethics Commission

“This publication is issued by the Oklahoma Ethics Commission as authorized by Executive Director, Lee Anne Bruce Boone, pursuant to Ethics [Rule 1.8](#), and is located at the following website: <http://www.ethics.ok.gov>. This publication has been submitted in compliance with [Section 3-114 of Title 65 of the Oklahoma Statutes](#).” This guide was updated on **October 7, 2024**. v2024.2

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Commissioners

Five Commissioners serve on the Commission for the Oklahoma Ethics Commission, with a term of five years and no more than two successive terms. The Commissioners serve on a volunteer basis and are appointed on a staggered basis by the (1) Governor, (2) Chief Justice of the Oklahoma Supreme Court, (3) Attorney General, (4) President Pro Tempore of the Senate, and (5) Speaker of the House of Representatives.

Information on the current commissioners may be accessed on the Ethics Commission website at [Oklahoma Ethics Commission - Commissioners](#).

What's New to This Guide?

- **Guide Updates:** The Guide includes changes to registration fees and date specific updates.

How to Use This Guide

This guide summarizes the Rules of the Oklahoma Ethics Commission as applied to legislative liaisons, legislative lobbyists, executive lobbyists and lobbyist principals, effective July 1, 2023. It is written by the Commission staff to assist in compliance with the Ethics Rules, as authorized by [Rule 1.8](#). This guide is not a substitute for the law. If there is a conflict between this guide and the Constitution, statutes or Ethics Rules, then the Constitution, statutes or Ethics Rules prevail.

Limited Scope

This guide only addresses Oklahoma law, specifically the Rules of the Oklahoma Ethics Commission, and is limited to lobbying at the state level. It does not address lobbying at the federal, county, municipal or school district levels. This guide is not intended to provide comprehensive information about all Ethics Rules and other relevant law concerning lobbying. Legislative liaisons, legislative lobbyists, executive lobbyists, and lobbyist principals should become familiar with the relevant constitutional and statutory provisions as well as with the Ethics Rules.

Ethics Commission Contact Information and Resources

Ethics Commission Website: Rules, Guides, Reporting Calendars, etc.

The Ethics Commission provides entity specific web pages on its website including the text of its rules, reporting calendars, informational Guides, and similar helpful information at www.ethics.ok.gov.

Contacting the Commission

The Ethics Commission office is located in Room G-27 of the State Capitol. The Commission's hours are generally **Monday through Friday from 8:30 a.m. to 4:30 p.m.**

- Telephone number: (405) 521-3451
- Fax number: (405) 521-4905
- E-mail: ethics@ethics.ok.gov.
- Address: 2300 N. Lincoln Blvd., Rm G-27, Oklahoma City, OK 73105

Information regarding the Commissioners, the Ethics Commission staff, and the Commission meeting agendas and minutes is located on the Commission's website at www.ethics.ok.gov.

Advisory Opinions and Staff Memoranda

[Rule 1.7](#) authorizes the Commission to issue official advisory opinions interpreting its Rules. Such advisory opinions are binding on the Commission. The Commission will consider an advisory opinion only as it applies to the person requesting the opinion, rather than third parties. Send advisory opinions requests to the Oklahoma Ethics Commission via email or mail.

Commission staff may issue Staff Memoranda to assist in compliance with the Rules or to answer common, recurring questions. These memoranda are less formal and do not interpret the Ethics Rules as do Advisory Opinions.

Viewing and Filing Reports: The Guardian System

The Guardian System is the Commission's electronic filing system in which all reports are filed. Once a report is filed in The Guardian System, it is immediately available to the public online. The Guardian System may be accessed on the Commission website at www.ethics.ok.gov or directly at <http://guardian.ok.gov>. The Guardian System is accessible 24 hours a day, 7 days a week.

One-on-one training for The Guardian System is available upon request but is generally unavailable the last 5 days of a filing period. Contact the Ethics Commission staff at (405) 521-3451 or ethics@ethics.ok.gov to make an appointment.

Continuing Education Programs

The Ethics Commission strives to hold continuing education programs throughout the year to assist with the understanding of and compliance with the Ethics Rules. Routine programs are currently suspended until funding is sufficient to resume the programs. Available programs will be announced on Social Media and through the GovDelivery Notification System.

GovDelivery Notification System

Sign up on the Ethics Commission website (www.ethics.ok.gov) to receive Ethics Commission notifications via text message and/or email. Users may subscribe to receive information from the

Commission on specific topics, such as lobbyist news, rule updates, continuing education programs, commission meetings, etc.

Ethics Commission On Social Media

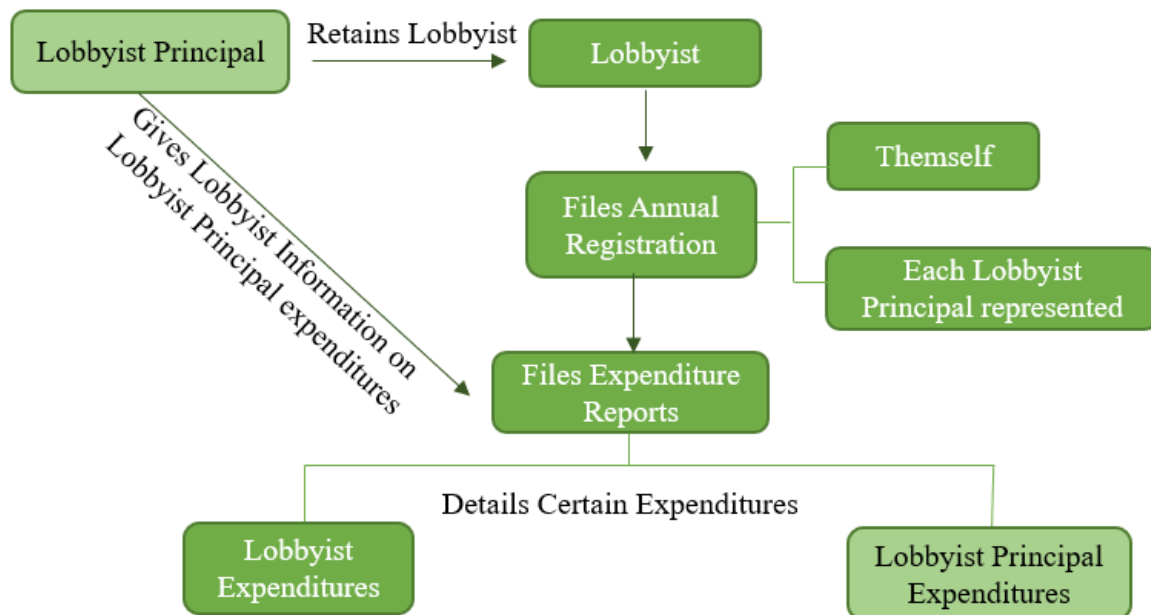
Follow the Ethics Commission on social media platforms to view updates on Ethics Commission news.

- Follow @EthicsOKgov on Twitter
- Like us on Facebook: <https://www.facebook.com/EthicsOKgov/>

Lobbying in Oklahoma Overview

“Lobbying” generally means oral or written communications with regard to the passage, defeat, formulation, modification, interpretation, amendment, adoption, approval or veto of any legislation, rule, regulation, executive order or any other program, policy or position of state government. Lobbying must be on behalf of a lobbyist principal.

Lobbying does not mean testimony given before or submitted in writing to a committee or subcommittee of the Legislature, nor a speech, article, publication or other material that is widely distributed, published in newspapers, magazines or similar publications or broadcast on radio or television. [Rule 5.2\(3\) and \(7\)](#).



Lobbyists, Liaisons, and Lobbyist Principals

1. General Information

Generally, individuals who engage in lobbying activities for compensation *on behalf of* a 3rd party are required to register and file reports in Oklahoma. Individuals who are not compensated to lobby on behalf of a 3rd party, or that only advocate on their own behalf, are not lobbyists under the Ethics Rules.

Individuals who are compensated to engage in lobbying activities on behalf of a 3rd party are defined by the entity they lobby and whether or not they are state officers or employees. These individuals are referred to as: (1) **legislative lobbyists**, (2) **executive lobbyists**, or (3) **legislative liaisons**. The 3rd party they lobby on behalf of is called a **lobbyist principal**.

2. Lobbyist and Legislative Liaison Information

A. Definitions

1. Legislative Lobbyists

Legislative lobbyists are individuals who are compensated to represent a lobbyist principal(s) by lobbying the Governor, the Legislature, and their staff. Legislative lobbyists are not state officers or employees but may be employees of political subdivisions (counties, municipalities, school or technology center districts). [Rule 5.2\(8\)](#).

2. Executive Lobbyists

Executive lobbyists are individuals who are employed or retained by a lobbyist principal for compensation to lobby state officers and employees of executive agencies. [Rule 5.2\(3\)](#).

3. Legislative Liaisons

Legislative liaisons are state officers and employees whose duties in fact include legislative lobbying, regardless of their job title or job description. [Rule 5.2\(6\)](#).

4. Individuals May Be Both Legislative and Executive Lobbyists

An individual may be both a legislative lobbyist and an executive lobbyist if he or she meets the definitions set forth above. This individual is only required to file one registration with the Ethics Commission and will follow the report filing schedule of a legislative lobbyist.

B. State Officers and Employees Are Prohibited from Being “Lobbyists”

State officers and employees are prohibited from engaging in lobbying activities for any entity that is not an entity of the State of Oklahoma. State officers and employees who engage in lobbying activities on behalf of their state entity may be required to register as a legislative liaison.

This prohibition applies to state employees, elected officers, members of boards, commissions, authorities, and similar public bodies of state agencies. This prohibition does not apply to

government employees or officers that serve or are employed by political subdivisions such as counties, school districts, or technology centers. [Rule 5.28](#).

C. Individuals Who Are Not Lobbyists

Not all individuals who engage in lobbying activities on behalf of lobbyist principals are considered lobbyists. For example, the following are not lobbyists:

- a. individuals who are not compensated for lobbying activities;
- b. federal officials acting in their official capacity;
- c. any person exercising his or her individual right to petition the government and receives nothing of value for lobbying; and
- d. individuals who although employed by or contract with a lobbyist principal, but whose activities may technically be lobbying but are only incidental to and not a significant part of the services provided by the individual to the lobbyist principal, are not considered legislative lobbyists.

D. “In-house” vs. “Contract” lobbyist

Some lobbyists represent only one lobbyist principal, while other lobbyists may lobby on behalf of numerous lobbyist principals. In instances where the lobbyist is an employee of the lobbyist principal, the lobbyist is sometimes called an “in-house lobbyist.” “Contract lobbyists” are independent contractors who provide lobbying services under contract with different lobbyist principals. [Rule 5.2\(4\)](#) and [Rule 5.2\(8\)](#). Both in-house and contract lobbyists follow the same registration and reporting requirements.

E. Lobbyists and Liaisons Must Disclose on Whose Behalf They are Lobbying

When engaged in lobbying activities, a legislative liaison, legislative lobbyist, or executive lobbyist is required, either orally or in writing, to identify the lobbyist principal or principals on whose behalf the lobbying activities are being conducted. **Any state officer or state employee who is, or may, be being lobbied may request such information and the information is required to be disclosed.** [Rule 5.27](#).

3. Lobbyist Principals

“**Lobbyist principals**” are private or public entities—including state agencies and institutions—that employ, or retain another person for compensation, to lobby State of Oklahoma officers and employees on its behalf. [Rule 5.2\(9\)](#).

A. Private Sector Lobbyist Principals

Private sector lobbyist principals are non-state government entities which include for profit businesses, not for profit organizations, associations, or another type of organization if the entity retains a lobbyist. It is the entity, not the individual members, partners, officers, or shareholders of an organization that is the lobbyist principal. [Rule 5.2\(9\)](#). A business or entity that does not have its own lobbyist is not a lobbyist principal even if it belongs to an organization with a lobbyist.

John Jones is the owner of Jones, Inc. a corporation that does not have a lobbyist. Jones, Inc. is a member of Widget Makers Association (“WMA”), a professional association that retains a legislative lobbyist to lobby for WMA. Neither Jones nor Jones, Inc. is a lobbyist principal; WMA is the lobbyist principal.

B. State Agencies as Lobbyist Principals

State agencies may be lobbyist principals. All state agencies must have at least one legislative liaison and may have more than one liaison. A state agency may also have one or more legislative lobbyists.

The Ethics Rules expressly contemplate that state agencies may contract with lobbyists to engage in lobbying activities on behalf of the state agency. Executive Order 2019-29 restricts agencies from entering agreements for lobbying without cabinet secretary approval. The Executive Order is not enforced by the Ethics Commission. Accordingly, Commission staff will not interpret the Order or its effect on agencies.

An agency is not required to have a legislative liaison if it falls within one of two of the following exceptions.

Private Lobbyist Exception: The agency contracts with a private legislative lobbyist to provide lobbying services for the agency and no state officer or employee lobbies for the agency; or

Information Requests Only Exception: The agency meets **each** of following two conditions:

1. All officers and employees of the agency provide information to the Governor or a legislator only at the request of the Governor or the legislator or as required by law; **and**
2. No officer or employee of the agency has requested legislation or other legislative action other than an appropriation for the agency.

[Rule 5.2\(6\).](#)

The term “state agency” does not include: (1) city, county, rural electric cooperative or tribal housing authorities created under the Oklahoma Housing Authorities Act; or (2) any state entity that performs only advisory functions and that cannot independently exercise the sovereign power of the State of Oklahoma.

Otherwise, the term “agency” includes an entity of state government (1) created by the Constitution or statutes and supported in whole or in part by state funds; (2) entrusted with the expending of state funds or administering state property; or (3) otherwise exercising the sovereign power of the State of Oklahoma. Generally, this includes all state offices, departments, institutions, boards, bureaus, commissions, agencies, authorities and instrumentalities of the State of Oklahoma.

Unless the agency is excluded by meeting one of the two exceptions described above, it is an agency that may have a legislative liaison, legislative lobbyist, or both. [Rule 5.2\(1\) and \(9\).](#)

C. Political Subdivisions as Lobbyist Principals

Political subdivisions such as counties, municipalities, towns, school districts, technology centers, etc. may be lobbyist principals. Political subdivision officers or employees are governmental officers or employees but are not considered “state officers” or “state employees” under the Ethics Rules.

When individual political subdivision officers or employees are engaged in lobbying, they do not meet the definition of legislative liaisons and must register as lobbyists.

Lobbyist, Liaison, and Lobbyist Principal Gift Rules

1. Gifts are Prohibited Unless Specifically Permitted

Generally, lobbyists, legislative liaisons, and lobbyist principals cannot provide gifts to state officers and employees of a state entity they lobby unless the gift is specifically permitted by the Ethics Rules.

- a) This prohibition applies to the lobbyist, liaison, or lobbyist principal making the gift and the state officer or employee who receives it. [Rule 5.6.](#)
- b) Gifts may not be given indirectly to a state office or employee through a family member of the state officer or employee.

A legislative liaison, legislative lobbyist or executive lobbyist may not indirectly provide a gift to a state officer or employee by providing a thing of value to a family member of the state officer or employee. “Family members” include the spouse, children (including stepchildren), mother, father, sister or brother. [Rules 5.2\(5\)](#) and [5.6.](#)

2. Universal Exceptions to the Prohibition for Lobbyists, Liaisons, and Lobbyist Principals

A. Prohibitions Apply Only to Lobbying Activities at State Entities Being Lobbied.

The Commission is not concerned with activity between a lobbyist and a state officer and employee of an agency not being lobbied by that lobbyist or liaison. Accordingly, all lobbyist, liaison, and lobbyist principals gift restrictions and exceptions apply only between lobbyists, liaisons, lobbyist principals and the state officer and employees of the state entities being lobbied.

1. For legislative lobbying, the state entities being lobbied by definition includes the Governor, legislature, and their respective staffs.
2. For executive lobbying, the state entity being lobbied will be an agency for which the lobbyist is, or should be, registered as a lobbyist.

Jane Doe is a registered legislative lobbyist who only engages in legislative lobbying. Her friend Bryan works for an executive branch agency. So long as Jane is not in fact lobbying Bryan, any meals or gifts from Jane to Bryan would not be restricted or reported.

B. “Trinket” Gifts – Limit of \$10

A lobbyist, liaison, or lobbyist principal may provide a gift of any **single item** with a fair market value not exceeding \$10 to any state officer or employee one time during any calendar year without incurring any reporting obligations. Subsequent gift(s) are prohibited if the gifts do not fall within another exception. [Rule 5.13](#).

C. Modest Items of Food and Refreshment Provided Occasionally

A lobbyist, legislative liaison, or lobbyist principal may provide modest items of food and refreshments to any state officer or employee **when offered, other than as part of a meal**. [Rule 5.12](#). This exception permits state officers and employees to accept minor refreshments without regard to the source providing the refreshments. These modest items are not subject to reporting requirements.

This exception includes items that are provided:

- a) **occasionally**; (daily, weekly, or similar routine meetings will not qualify);
- b) offered other than as part of a meal such as soft drinks, coffee, doughnuts, and similar items; and does not include
- c) alcoholic beverages, including low-point beer, or more substantive items such as hors d’oeuvres and similar fare.

1. Jane Doe is a legislative lobbyist in Oklahoma. She holds a legislative meet and greet in January and provides cookies, soft drinks, and water. This would qualify as modest items of food and refreshment and is not required to be reported.
2. Same example as above, except Jane Doe hosts a meet and greet every Monday afternoon during legislative session for legislators and legislative staff. Jane Doe must now identify all legislators and legislative staff that attend and report the cost of the cookies, snacks, soft drinks, and water on an individual basis because the food and beverage is provided regularly by the lobbyist and not on an occasional basis.

D. Books and Similar Informational Material Related to the State Officers’ or Employees’ Job Responsibilities. No Limit, Only Report if Item exceeds \$100.

As of January 1, 2021, a lobbyist, liaison, or lobbyist principal may give a state officer or employee a book or similar informational materials that are related to the state officers or employees state responsibilities. [Ethics Rule Amendment 2021-02](#).

This exception does not affect lobbying communications such as emails, letters, flyers, or similar communications, which are already included within the definition of lobbying.

There is no limit on the value of gifts the state officer or employee may receive, but if a single item exceeds \$100, such gift must be reported.

3. Liaisons and Lobbyists Providing Meals and Gifts

In addition to the universal exceptions to the gift prohibition above, the following exceptions apply to legislative liaisons, legislative lobbyists, and executive lobbyists, collectively referred to below as “lobbyists”. Specifically, it addresses exceptions for gifts of meals (which includes meals and non-meal food and beverage) and non-meal gifts.

A. Lobbyist Gift Exception 1: Meals, Food, & Beverage– Limit of \$500 per Individual per Calendar Year

A lobbyist may spend up to \$500 per calendar year for meals (which includes meals and non-meal food and beverage) for each individual state officer and employee of the entity being lobbied.

1. **Attendance Requirement:** The lobbyist must attend the meal with the recipient. [Rule 5.6](#).
2. **Source of Funds:** This limit applies regardless of the source of funds used for payment, including a lobbyist’s or liaison’s personal funds, or funds given to or otherwise reimbursed to the lobbyist or liaison by the lobbyist principal. [Rules 5.7](#) and [5.10](#).
3. **Meals, Food, Beverage and other Gifts are Aggregated:** The aggregate total of all meals, food, and beverage provided to state officer or employee by a lobbyist are aggregated together. Any gifts given by lobbyists for “infrequently occurring occasions of personal significance” in **Exception 2** are added with food and beverage and together may not exceed \$500 during a calendar year.

B. Lobbyist Gift Exception 2: Gifts for Infrequently Occurring Occasions of Personal Significance (“Major Life Events”) – up to \$100 of \$500 Meal Limit per Individual per Calendar Year

The aggregate total of all food, beverage, and major life event gifts provided to an individual by a lobbyist may not exceed \$500 during a calendar year. These items are significant to the recipient, not the giver. The limit for gifts given for Major Life Events is \$100 for each individual recipient in any calendar year. These gifts count toward the overall \$500 limit. [Rule 5.8](#) and [Rule 5.11](#).

Gifts to State Officers & Employees

1. Gifts to State Officers & Employees

A gift under this rule must be given on an occasion that is:

- a. less frequent than an annual occasion;
- b. made in recognition of a major life event that is personally significant to the recipient state officer or employee (family member gifts must fit within a specific category, see next section);
- c. given contemporaneously with the event or at a time when gifts are traditionally provided; and

- d. if the gift includes tickets or attendance to an event the lobbyist must attend the event with the recipient.

2. Gifts to Family Members of State Officers & Employees

Gifts to a family member of a state officer or employee are permissible in limited circumstances. “Family members” include the spouse, children (including stepchildren), mother, father, sister or brother. The family member must be “a party to” one of the following specific events:

- a. marriage,
- b. serious illness,
- c. birth or adoption of a child, or
- d. retirement. (Retirement does not include the end of an elected or appointed term of office.)

Gifts to family members count against the meal and gift limit for the state officer or employee.

See [Rules 5.2\(5\), 5.8 and 5.11](#); See [Advisory Opinion 2018 OK Ethics 01](#) (rescinded, but analysis for major life events applies), and [Staff Memorandum 2015-05](#).

4. Lobbyist Principal Gifts, Food, and Beverages

The limits described in this section assume the following about a lobbyist principal: the lobbyist principal (1) is not a current vendor of the agency; or (2) is not a vendor selling or seeking to sell to the agency, and the officer or employee is not engaged in a purchasing decision, as described in Ethics [Rule 4.8](#). If the lobbyist principal is a vendor, then the rules set forth in [Ethics Rule 4](#) should be reviewed. Vendors, who may also be lobbyist principals, are subject to additional restrictions that are not the subject of this guide. For assistance in complying with the applicable Ethics Rules, access the “Officers and Employees Guide” and other materials made available on the Commission’s website at www.ethics.ok.gov.

A. Lobbyist Principal Gift Exception 1: Plaques, Trophies or Similar Displayable Items

A lobbyist principal may give a plaque, trophy, or similar item suitable for display no more than once per year to a state officer or employee in acknowledgement of the officer or employee’s public service.

The item cannot exceed \$200 in value (including tax) and must be reported in a Lobbyist or Liaison Expenditures Report. [Rule 5.13](#).

B. Lobbyist Principal Gift Exception 2: Tickets or Sponsorships for Community, Civic and Charitable Events

A lobbyist principal may purchase tickets for or otherwise provide sponsorship for a bona fide community, civic or charitable reception, breakfast, luncheon, or dinner attended by state officers and employees who are guests of the sponsoring organization.

Such activities must be customary for the lobbyist principal, and the lobbyist principal may not designate state officers or employees to be guests. In other words, the tickets must be provided to state officers or employees generally. [Rule 5.18](#).

If a lobbyist, on behalf of a lobbyist principal, designates a state officer or employee as a guest, the cost of attendance must be reported and counts toward any applicable meal and gift limits. For an event that is a meal, the cost of the ticket to attend is reported as a meal. See [Staff Memorandum 2015-01](#).

C. Lobbyist Principal Gift Exception 3: Legislative Events for Lobbyist Principals who have Legislative Lobbyists or Legislative Liaisons

The following exceptions apply specifically to legislative events and are available only to lobbyist principals who have a legislative lobbyist or liaison. There are no counterparts for executive branch agency events.

The Rules below recognize collecting the name, title, and value of food or beverage of each attendee may be impractical and instead permit reporting the cost of food and beverage as a lump sum rather than on an individual basis.

The following exceptions may each be participated in once per calendar year per lobbyist principal. More than one lobbyist principal may “host” or provide food and beverage for such an event, but a lobbyist principal may not participate in more than one during a calendar year.

Reporting: The legislative lobbyist or liaison will report the event on behalf of the lobbyist principal. Both must ensure procedures are established for timely and accurate reporting. If more than one lobbyist principal provides food and beverage for the event, the percentage reported will be based on the percentage of the food and beverage provided by the principal instead of 100%. [Rule 5.14](#).

1. Events to Which All Members of the Legislature Are Invited

A lobbyist principal may provide and report food and beverage, as a lump sum, for one event per year to which all members of the Legislature are invited.

2. Recognized Political Caucus Events

A lobbyist principal may provide and report food and beverages for a meeting of an officially recognized party’s political caucus, of either the House or Senate, no more than once per calendar year per caucus.

“Political caucus” means a caucus of legislators of a political party recognized under state law. The only political caucuses in Oklahoma currently are:

- a) Senate Republican caucus,
- b) Senate Democratic caucus,
- c) House Republican caucus, and

d) House Democratic caucus.

Other “caucuses” organized by members of the Legislature that hold events will not qualify to be reported as an “event” but would be reported on an individual legislator basis.

Note that an outing that includes all members of a political caucus will not necessarily qualify for this exception. To qualify, the caucus must engage in caucus business.

Example: ABC, Inc. wants to acknowledge the end of legislative session by throwing a Sine Die party for one of the officially recognized caucuses once the legislature has adjourned “sine die” for the legislative session. The party will not qualify as a “caucus event” even if all members of the political caucus attend.

3. Legislative Committee and Subcommittee Events

A lobbyist principal may provide and report, as a lump sum, food and beverage for an event to which all members of a committee or subcommittee of the Senate or House of Representatives are invited, provided the event is reported as required by the Ethics Rules. **The event must be held in the Capitol building, and it must be attended by a majority of the members of the committee or subcommittee.** Sufficient records of those in attendance is necessary to maintain such information.

To qualify for this type of event, the committee or subcommittee must be identified in the Rules or Journal of the respective legislative body.

Members and Legislative Staff Not Assigned to the Committee or Subcommittee: This provision does not include legislators who are not members of the committee or subcommittee, nor legislative staff members who do not officially or regularly provide staff services for the committee or subcommittee. Food and beverage provided to members and legislative staff not assigned to the committee or subcommittee must be reported individually as a meal from the lobbyist, and that expense will count toward the lobbyist’s \$500 aggregate limit for meals and gifts for that individual.

4. Out-of-State Events

A lobbyist principal may provide and report as, a lump sum, food and beverage for an event at a professional conference, seminar or other similar meeting conducted outside the geographical boundaries of the State of Oklahoma, provided the event is reported as required by the Ethics Rules.

D. Lobbyist Principal Gift Exception 4: State Agencies Lobbyist Principals Only. Tickets from an Agency to a Conference, Seminar or Lecture Sponsored in Whole or Part by the Agency

Lobbyist principals, **that are state agencies**, may provide two tickets to any conference, seminar, lecture or similar event held within Oklahoma and sponsored in whole or part by the agency to the Governor, any legislator or any employee of the Governor or Legislature. The tickets must be used by the recipient or a family member of the recipient. [Rule 5.6](#).

E. Community Relations (Non-Lobbying Activities): Meals Provided by a Non-Lobbyist Employee of a Lobbyist Principal to Legislators

An employee of a lobbyist principal, who is not a legislative liaison, legislative lobbyist, or executive lobbyist may provide a meal (no more than twice a year) to a legislator, at the expense of the lobbyist principal, if all of the following conditions are met:

- The employee may not be acting at the direction of a legislative liaison, legislative lobbyist, or executive lobbyist. The employee may not engage in lobbying activity of any kind.
- The employee must be either a constituent of the legislator, or must be engaged in providing goods or services for the lobbyist principal within the legislator's district.
- Finally, the employee must typically engage in similar activities with other public officials in the geographical area within which the goods or services are provided.

[Rule 5.9](#); [Staff Memorandum 2015-04](#).

Registration with the Ethics Commission

Lobbyist registrations are calendar year registrations that automatically expire December 31st of the registration year. All lobbyists and legislative liaisons who engage in lobbying for the registration year will register with the Ethics Commission. The annual registration and renewal period begins December 1st of each year. The registration and renewal period ends January 15th of the year for which the lobbyist is registering. For those required to register, reports detailing expenditures are required according to the schedule that applies to the type of registration. These calendars are in [Appendix 1 & 2](#), the Commission website, and show in The Guardian System on the lobbyist's or liaison's account page.

Registering after the annual registration period: a lobbyist or liaison that is retained after the registration period must register within 5 days of engaging in lobbying activities. [Rule 5.3](#) and [5.5](#).

All lobbyists and legislative liaisons file an initial registration for the first registration year, and file renewal registrations thereafter. This is true even when the lobbyist or liaison skips one or more registration years. Lobbyists and liaisons will register themselves and each lobbyist principal they will represent for the registration year and will add/remove principals as necessary throughout the year. [Rule 5.3](#) and [5.5](#).

An *executive lobbyist* who has not terminated their registration on or before November 30th is required to renew for the upcoming calendar year.

1. Registering as a Lobbyist or Liaison in Oklahoma

Electronic registration is required in The Guardian System. The Guardian System is available on the Commission website at www.ethics.ok.gov or at <http://guardian.ok.gov>. A registration and

administration fee is assessed for the lobbyist or liaison and each lobbyist principal registered in Oklahoma. [Rule 6.19](#). This fee is set annually before July 1 and is posted on the website. The fee is currently \$125. Lobbyist principals with multiple lobbyists or liaisons only pay a single principal fee.

Fee Payment: The lobbyist or liaison may pay the fees on behalf of their principals or the principals may pay their own fee. The fees may be paid via credit card in The Guardian System where an additional service charge will be assessed, or by check to the Ethics Commission. Registration is not complete until all fees are paid. However, the date of registration is the date the registration is submitted.

State Agencies Only: A state agency may request to be invoiced the fee by emailing ethics@ethics.ok.gov.

Principal with multiple lobbyists: Only one of the lobbyists will pay the \$125 for that lobbyist principal, the lobbyists should communicate between themselves to ensure each lobbyist registers the principal using the same information **and** to determine which lobbyist will pay the registration fee for the principal.

A. Lobbyists or Liaisons Currently or Previously Registered in The Guardian System

Lobbyists or liaisons who have previously been registered in The Guardian System and are registering as a lobbyist or liaison for a second or subsequent registration year must log in to their Guardian System account to renew their registration. The registration will automatically populate with the most recent information in The Guardian System for the lobbyist or liaison and their principals. This information must be updated as necessary to reflect current, accurate information.

Registration types may be changed between executive, legislative, or both legislative and executive lobbyist during renewal. However, previously registered lobbyists may not change to legislative liaisons and liaison registrations may not be changed to lobbyists. A change of this type would require registration as a new lobbyist or liaison.

B. First Time Registrations

Lobbyists or liaisons who have never registered in The Guardian System will use the “Registration” tab on The Guardian System. The following information is required:

1. **Lobbyist or Liaison Information:** Includes lobbyist or liaison name, business address, e-mail address, and business telephone numbers.
2. **Lobbyist Principal Information:** Lobbyist, liaisons, and lobbyist principals must ensure the lobbyist or liaison has accurate information for the principal such as full legal name, a contact person and contact information for that person other than the lobbyist or liaison, and all other lobbyists or liaisons representing the principal.
 - a. **Oklahoma Secretary of State “SOS” Registered Principals:** The Guardian System integrates the entities registered with the Oklahoma Secretary of State so lobbyists may do a name or registration number search. Many entities have similar names. It is the

lobbyists responsibility to ensure they select the correct entity. Because of this integrated process, The Guardian System is able to identify whether a registration fee for that entity has already been paid so the fee for the lobbyist principal is only paid once.

- b. **Oklahoma State Agencies:** The Ethics Commission staff maintains a drop-down list, in The Guardian System, so lobbyists and liaisons can easily select the State Agency they represent. If the state entity is not in the list, please call Commission staff for assistance. Because of this list, The Guardian System is able to identify whether a registration fee for that agency has already been paid so the fee for the lobbyist principal is only paid once.
- c. **Non-SOS and Non-Agency Lobbyist Principals:** After verifying the entity is not in the SOS database, an option will be provided to enter the lobbyist principal information. Because The Guardian System is unable to verify whether a registration fee has been paid by another lobbyist or liaison for these entities, the registrant must verify if they, or another registrant, will pay the registration fee and will be able to select whether or not to be charged for that principal. The registration will not be fully accepted until Commission staff verifies the fee has been paid.

Acronyms and abbreviations cannot be used. For example, if the name of a lobbyist principal is Widgets Manufacturing Incorporated, that is the name that should be used, not “WM Inc.” or “Widgets Mfg. Co.” [Rules 2.122](#), [5.3](#) and [5.5](#).

- d. **Point of Contact for Lobbyist Principal Required:** Lobbyist principals are engaging in regulated activity in the state of Oklahoma. The Commission must be able to communicate directly with a representative of the lobbyist principal. This will be someone other than the lobbyist, and typically will be the person authorizing the contract or assigning the duties of the lobbyist or liaison.
- e. **Agencies to be Lobbied:** For each lobbyist principal, the lobbyist must identify which agencies will be lobbied.
 - i. **Legislative Lobbyists and Legislative Liaisons:** Because these lobbyists only lobby the legislature, governor, and their staffs, this field will automatically populate.
 - ii. **Executive Lobbyists:** The executive lobbyist must identify which agency or agencies they will lobby on behalf of the lobbyist principal. If the lobbyist is also a legislative lobbyist, the lobbyist must identify for each lobbyist principal the executive branch entities being lobbied and whether the legislature, governor, and their staffs are also being lobbied.

Jenny Jones is both a legislative and executive lobbyist representing lobbyist principals A, B, and C.

Principal A will only utilize legislative lobbying, the lobbyist will select agency: Governor/Legislature & staff.

Principal B will only utilize executive lobbying at the Ethics Commission and Tax Commission, the lobbyist will select each agency from the drop-down list.

Principal C will utilize both legislative and executive lobbying and will lobby the Corporation Commission in addition to the legislative lobbying. Jenny Jones will need to select both the Corporation Commission from the agency drop down list and the Legislature/Governor & staff to ensure the registration accurately reflects on whose behalf Jenny Jones will be lobbying and where she will lobby.

C. **Registration Submission and Approval**

Filer's must verify the information on the registration is true and accurate prior to submitting the registration, and, must click the "submit" button. If the registration has been submitted, the filer will see a webpage confirming the registration was submitted as well as an email sent to the email on the registration.

Submitted registrations are not automatically approved but are personally reviewed by Commission staff during normal business hours. Registrations are reviewed to verify the registration is in substantial compliance with the requirements, the registration fees have been paid, and whether any required reports have not been filed. Commission staff may do one of the following:

1. **Approve the Registration in Full or Conditionally:** These registration statuses mean the date the registration was submitted is the date of registration. The lobbyist, liaison, and/or others authorized to access the account receive emails with their unique username and a temporary password. A permanent password must be set within 7 days and should be saved somewhere for easy access.
 - a. **Full Approval:** this means the registration is approved as of the date it was submitted, the form appears to meet the requirements for registration, required fees have been paid, and all required reports (if any) have been filed.
 - b. **Conditional approval:** this means the registration is approved as of the date it was submitted, that most of the registration requirements have been met but additional action must be taken in order for the registration to be fully approved.
 - i. This permits the lobbyist or liaison to login to their Guardian account, enter data, correct information, but will not permit the filing of required reports.
 - ii. The removal of "conditional" from the acceptance requires review by Commission staff during normal business hours. Lobbyists and liaisons must be mindful of reporting deadlines and Commission office hours. Lobbyists and liaisons should take the actions necessary to remove the conditional status, allow Commission staff sufficient time to review the actions taken, and fully accept the registration, provided it qualifies for full acceptance.

2. **Reject the registration.** In very rare circumstances, a registration is filed under circumstances that result in rejection of the registration. Typically, this is where the registration was submitted multiple times. Registrations will typically be rejected after consultation with the filer.

2. Expiration or Termination of Registration

A. Registrations Automatically Expire

Registrations automatically expire December 31 of the registration year without any action by the lobbyists or liaisons. The expiration of registration will not prevent a lobbyist or liaison from filing reports due for their registration year, including the one due after the registration year ends for activity during the end of the registration year. [Rules 5.4](#), [Rule 5.5](#), [5.19](#), and [5.20](#).

Jenny Lobbyist is registered for 2023 as a legislative lobbyist but will not register to lobby in 2024. Jenny's registration for 2023 automatically ends on December 31, 2021, but Jenny has a report to file between January 1 and January 15, 2024 for activity that occurred from July 1 – December 31, 2023. Jenny will be able to file the final 2023 report even though she does not renew her registration for 2024.

B. Termination of a Registration

Lobbyists who will no longer lobby in the state of Oklahoma, or, liaisons who leave state employment prior to the end of the registration year, must “terminate” their registration by following the steps below. However, those lobbyists who are adding or removing lobbyist principals will not terminate their registration; instead, they will amend their registration within 5 days of the lobbyist principal change by adding and deleting the lobbyist principals. [Rules 5.4](#), [Rule 5.5](#), [5.19](#), and [5.20](#).

A lobbyist or legislative liaison may terminate a registration by (1) filing any outstanding reports, (2) clicking the “terminate registration” button in the Guardian System, and (3) filing a final expenditure report that includes all activity up to the termination date.

Expenditures Reports: Contents and Filing Dates

Periodic reports are required of all lobbyist and liaisons detailing expenditures by them and their principals. Reports are required even when no expenditures are made. Lobbyists and liaisons may add and remove individuals, called Designated Filing Agents, to enter data and file reports on behalf of the lobbyist or liaison at any time. This is especially useful if the lobbyist or liaison is scheduled for vacation or otherwise out of the office but has a report due during that time as a lobbyist or liaison is not allowed to share their credentials to The Guardian System.

1. General Information

A. Due Dates Include Weekends and Holidays

Reports are due on the date specified, **regardless of weekends and holidays**, and are required to be filed electronically in The Guardian System. [Rule 2.122](#). Reports may be timely filed until 11:59 p.m. (Central Time) on the date the report is due. However, Commission staff is only available to assist filers during Commission hours. During regular office hours on or before the deadline day, Lobbyists and Liaisons must:

1. verify they can log in to the filer's Guardian System account;
2. a "[View/File](#)" link appears next to the appropriate report; and
3. if necessary, email the Commission staff prior to 3:00 p.m. on the last business day before the filing deadline for assistance.

B. Legislative Lobbying Reporting Calendar: Included as Appendix 1

Legislative liaisons, legislative lobbyists, and those lobbyists registered as *both* legislative and executive lobbyists follow the legislative lobbying reporting dates. To view the current reporting calendar on the Ethics website [click here](#).

C. Executive Lobbyists Reporting Calendar: Included as Appendix 2

Each executive lobbyist must file four Lobbyist Expenditures Reports in The Guardian System. Each report covers the expenditures made during the preceding calendar quarter.

Executive lobbyists who also lobby the legislature will use the legislative lobbying reporting calendar above. To view the current reporting calendar on the Ethics website [click here](#).

D. Lobbyist and Liaisons not Lobbyist Principals are Responsible for Late Filings

If a lobbyist or liaison does not file all the reports required it is the lobbyist who is responsible for the late filing, not the lobbyist principal.

E. Authorizing Designated Filing Agents (DFA) to Assist with Reporting

A registered lobbyist or liaison may add one or more Designated Filing Agents ("DFA") to his or her account at any time in The Guardian System. A DFA may enter data and file reports on behalf of the lobbyist or liaison. Adding a DFA is recommended to ensure reports are filed in a timely manner.

DFAs must be added to the system to obtain his or her own login credentials to access the system. **Usernames and passwords must not be shared.** The name of the individual who is assigned the username used to file the report, is the name that appears as the filer of the report. To ensure the information is accurate, each person authorized to access an account must have his or her own credentials.

2. Reporting Expenditures

Lobbyists and liaisons must routinely report expenditures for meals, gifts, and other items to the Commission. Regardless of whether the gift is permissible within the Rules, it must be reported on the appropriate report. Commission staff may be contacted for assistance in corrective actions.

A. Lobbyists and Liaisons Report Expenditures for Themselves and their Lobbyist Principals

The lobbyist or liaison reports their own expenditures and those of each client. The lobbyist or liaison must ensure they have the information they need to file timely and accurate reports. [Rule 5.6; Staff Memorandum 2015-04](#).

Lobbyists or liaisons may enter expenditure information into The Guardian System at any time using the “**Expenditures**” tab when logged into The Guardian System. Entering expenditure information as it occurs will expedite the filing of reports during the reporting periods. This is especially important for legislative lobbyists who have shortened reporting periods for activity that occurs during legislative session.

B. Avoid Duplicate Reporting for Lobbyist Principal with Multiple Lobbyists

Expenditures made by a lobbyist principal that is represented by more than one legislative liaison, executive lobbyist, or legislative lobbyist are reported on the Expenditures Reports by one liaison or lobbyist. All other legislative liaisons, executive lobbyists or legislative lobbyists representing the same lobbyist principal will indicate on their reports the name of the legislative liaison or lobbyist that is reporting the expenditure on behalf of the lobbyist principal. This is designed to prevent the same event from being replicated on reports and causing a distortion in the perceived amount of the expenditure. [Rule 5.21](#).

3. Filing Reports

A. Verify Registration Information is Accurate

As part of each expenditure report, a lobbyist, liaison, or designated filing agent is required to review the most recent registration and update it as needed. This includes both the information for the lobbyist or liaison as well as the information regarding the lobbyist principals represented by the lobbyist or liaison.

B. Amend Registration Prior to Filing Reports if Necessary

If anything has changed on the registration, it must be amended prior to filing the expenditure report.

C. Filing the Report

After all expenditures have been entered using the “**Expenditures**” tab, the lobbyist or liaison will use the “**Filings**” tab to access the required report. Click the “**View/File**” link next to the report to be filed. The Guardian System will generate a summary report on the “**Filing Page**” and the

opportunity to review the report prior to filing by using the “**Preview**” button next to the “**File**” button. To file the report, the filer must: (1) verify the information on the Registration is accurate; (2) acknowledge the information reported is true and accurate, and (3) click the “**File**” button.

The Filer should verify the filing was submitted by waiting for the message, “the filing was successfully submitted”. The Filer can also click the “**Filings**” tab to verify the report has moved from the “**Reports Due**” grid to the “**Filed History**” grid which shows the filed date of the reports.

D. Amending Reports

A lobbyist or liaison may file an Amended Lobbyist or Liaison Expenditures Report at any time to correct a bona fide oversight or error. The individual filing the report must certify that the amended report is not filed for the purpose of reporting information that was intentionally omitted or misstated on the previously filed report. If the amended report is in fact made to correct a genuine oversight or error, the liaison or lobbyist will not be deemed to have violated the Ethics Rules by filing the prior erroneous report. [Rule 5.23](#). Amended reports are filed by:

Using the “**Expenditures**” tab to add, delete, or edit transactions that need to be included on the amended report; and

Clicking the “**Filings**” tab, finding the report in the “**Filings History**” grid and clicking the “**Amend**” button next to the report to be amended, reviewing the information, and completing the same steps as referenced in **C. Filing the Report** in the prior section.

E. Record Keeping Requirements: 4 Year Retention

To make accurate reports of expenditures on the Lobbyist or Liaison Expenditure Reports as required by the Ethics Rules, liaisons and lobbyists must keep detailed receipts and other documentary evidence of the expenditures made by themselves and their clients. Records must be **retained for a period of at least four years** and must be made available to the Ethics Commission upon request. The Commission also has the power to subpoena documents if necessary. [Okla. Const. art. XXIX, § 4](#); [Rule 5.26](#).

Waiver for Preexisting Relationship

A state officer or state employee may apply to the Commission for a waiver of any of these rules, based on a preexisting relationship between the state officer or employee and a legislative liaison, legislative lobbyist, or executive lobbyist. The Commission has exclusive authority and discretion to grant a waiver on a case-by-case basis, based upon (1) the totality of circumstances and (2) a finding that the purpose of these Rules will not be impeded or hindered by the waiver.

Such a waiver will be prospective in effect and will not be applied to situations that have already occurred. The Commission may request whatever information it deems appropriate from an applicant, which may include verified statements by the parties involved.

The restrictions between a state officer or employee and a legislative liaison, legislative lobbyist, or executive lobbyist will not apply when the two are family members. Family members are regarded as having a preexisting relationship.

Form: The waiver request form is available on the Ethics Commission website at www.ethics.ok.gov on the “State Officers & Employees” page under Forms. [Rule 5.25](#). Waivers that are granted are uploaded in The Guardian System to the lobbyist or liaisons account.

Special Situations

1. Lobbyist Principals Who Are Vendors

If the lobbyist principal is a vendor, then the rules set forth in [Ethics Rule 4](#) should be reviewed. Vendors, who may also be lobbyist principals, are subject to additional restrictions that are not the subject of this guide. For assistance in complying with the applicable Ethics Rules, access the “Officers and Employees Guide” and other materials made available on the Commission’s website at www.ethics.ok.gov.

2. Campaign Contributions by Lobbyists and Lobbyist Principals

A. Legislative Session Restrictions: Contribution Blackout Period

The following is not an Ethics Commission Rule; it is a criminal statute under [Title 21, Crimes and Punishments § 187.1](#). This statute is enforced by the Attorney General’s office or District Attorney’s office, not the Ethics Commission. The Ethics Commission will not give advice on this section and all questions should be directed to the criminal prosecuting authorities who enforce the statute. This subsection is provided merely for informational purposes.

No lobbyist or lobbyist principal may make or promise to make a contribution to, or solicit or promise to solicit a contribution for a member of the Oklahoma Legislature or a candidate for state legislative office during any regular legislative session, beginning the first Monday in February, through its adjournment and for 5 calendar days following sine die adjournment. A member of the Legislature or a candidate for state legislative office may not intentionally solicit or accept a contribution from a lobbyist or lobbyist principal during the same time period. This provision does not prevent a political action committee affiliated with a lobbyist principal corporation or labor union from making a contribution.

This provision does not prevent a political action committee from making a contribution unless the committee is a lobbyist principal. Violations of this provision are criminal code violations, which will result in criminal penalties that are outside the jurisdiction of the Ethics Commission.

B. Campaign Contributions

Lobbyists, liaisons, and certain lobbyist principals may make campaign contributions to political party committees, political action committees, and candidate committees in accordance with Oklahoma law. Contributions by lobbyists and eligible lobbyist principals are reported by the

political parties, candidates, and political action committees and are not reported on a lobbyist's reports to the Ethics Commission. See the applicable political committee Guide available on the Ethics Commission website (www.ethics.ok.gov).

C. Corporate Contributions Prohibited:

Many lobbyist principals are incorporated and are not eligible to contribute to political parties, candidates, or limited political action committees.

D. Identifying Occupation for Political Committee Reporting

A lobbyist making a contribution to a political committee should report his or her occupation to the committee as "lobbyist". Where a lobbyist is both a lobbyist and a political consultant, both "lobbyist" and "political consultant" may be reported. [Rule 2.17](#).

E. Lobbyists Providing Campaign Contribution Consulting Services

Lobbyists that provide guidance for a political action committee of the lobbyist principal should exercise caution. First, that may come within the blackout period in (A) above. Second, the Ethics Rules promote transparency in campaigns and lobbyists may unintentionally become a contributor to a political committee when it provides a service to the committee without compensation for that service.

A lobbyist providing guidance to a lobbyist principal that has a political action committee, or other political committee, may be providing an "in kind contribution" to the political committee which needs to be reported on the political committee's Campaign Contribution and Expenditure Reports. If the lobbyist principal is incorporated, such a contribution may be prohibited, in which case, the political committee should pay fair market value for the guidance.

The lobbyist should ensure the political committee knows the value of the service and may want to notify the political committee that it needs to be reported in accordance with the [Campaign Finance Ethics Rule 2](#).

Enforcement and Compliance

The Ethics Commission is constitutionally required to enforce its rules, and does so through Compliance Orders, using an administrative process for less substantive issues and a formal investigatory process established in the Constitution for more substantive issues.

Enforcement Guide: The Commission's Enforcement Guide explains the enforcement process in more detail.

1. Compliance Orders

The Executive Director is authorized to issue compliance orders to obtain compliance with these rules. A compliance order may direct certain actions, including payment of funds. [Rule 6.3](#) and [6.19](#).

The Commission historically uses a late filing monetary schedule for late filings. The Schedule is \$100 per day for the first 6 days and \$400 for the 7th day. A liaison or lobbyist who files more than one Lobbyist Expenditures Report late shall be deemed to have intentionally violated the Rules except for good cause shown.

The Commission has a mechanism in its Rules to address late filings using an Administrative process with an Administrative Hearing conducted by an administrative law judge. Information on how to request such a hearing is made available along with the issued compliance order. [Rule 6.19](#).


2. Formal Complaints and Investigations

For enforcement matters unable or inappropriate to handle through the compliance order process, including repetitive failure to comply with Compliance Orders, the Commission may pursue a more formal complaints and investigations process. This process is handled by the Commission rather than Commission staff, involves a formal investigation, subpoena power, and may result in district court action and civil penalties beginning at \$5,000. [Rule 6.3](#) and [6.12](#).

Enforcement Guide: More information on how the Commission Enforces its Rules and how Complaints may be filed are available in the Enforcement and Compliance Guide on the Commission's website (www.ethics.ok.gov).

APPENDICES

APPENDIX 1 – LEGISLATIVE & LIAISON REPORTING CALENDARS




Oklahoma Ethics Commission

2024: Legislative Lobbyist Reporting Calendar

LEGISLATIVE LOBBYIST REPORTING CALENDAR		
FILING DATES:	PERIOD COVERED:	TYPE OF REPORTS DUE:
January 1 - January 15, 2024*	July 1 - December 31, 2023	2023 July – December Lobbyist Expenditures Report*
<i>December 1, 2023 – January 15, 2024</i>	<i>Calendar Year 2024</i>	<i>Registration/Renewal</i>
February 1 - February 5, 2024	January 1 - January 31, 2024	2024 January Lobbyist Expenditures Report
March 1 - March 5, 2024	February 1 - February 29, 2024	2024 February Lobbyist Expenditures Report
April 1 - April 5, 2024	March 1 - March 31, 2024	2024 March Lobbyist Expenditures Report
May 1 - May 5, 2024	April 1 - April 30, 2024	2024 April Lobbyist Expenditures Report
June 1 - June 5, 2024	May 1 - May 31, 2024	2024 May Lobbyist Expenditures Report
July 1 - July 15, 2024	June 1 - June 30, 2024	2024 June Lobbyist Expenditures Report
<i>December 1, 2024 – January 15, 2025</i>	<i>Calendar Year 2025</i>	<i>Registration/Renewal</i>
January 1 - January 15, 2025	July 1 - December 31, 2024	2024 July-December Lobbyist Expenditures Report

*This report is the **Final Report** due for Registration Year 2023 for Legislative Lobbyists.



Oklahoma Ethics Commission

2024: Legislative Liaison Reporting Calendar

LEGISLATIVE LIAISON REPORTING CALENDAR		
FILING DATES:	PERIOD COVERED:	TYPE OF REPORTS DUE:
January 1 - January 15, 2024*	July 1 - December 31, 2023	2023 July - December Liaison Expenditures Report*
<i>December 1, 2023 – January 15, 2024</i>	<i>Calendar Year 2024</i>	<i>Registration/Renewal</i>
February 1 - February 5, 2024	January 1 - January 31, 2024	2024 January Liaison Expenditures Report
March 1 - March 5, 2024	February 1 - February 29, 2024	2024 February Liaison Expenditures Report
April 1 - April 5, 2024	March 1 - March 31, 2024	2024 March Liaison Expenditures Report
May 1 - May 5, 2024	April 1 - April 30, 2024	2024 April Liaison Expenditures Report
June 1 - June 5, 2024	May 1 - May 31, 2024	2024 May Liaison Expenditures Report
July 1 - July 15, 2024	June 1 - June 30, 2024	2024 June Liaison Expenditures Report
<i>December 1, 2024 – January 15, 2025</i>	<i>Calendar Year 2025</i>	<i>Registration/Renewal</i>
January 1 - January 15, 2025	July 1 - December 31, 2024	2024 July - December Liaison Expenditures Report

*This report is the **Final Report** due for Registration Year 2023 for Liaisons.

APPENDIX 2 – EXECUTIVE REPORTING CALENDAR



Oklahoma Ethics Commission

2024: Executive Lobbyist Reporting Calendar

EXECUTIVE LOBBYIST REPORTING CALENDAR		
FILING DATES:	PERIOD COVERED:	TYPE OF REPORTS DUE:
January 1 - January 15, 2024*	October 1 - December 31, 2023	2023 4 th Quarter Lobbyist Expenditures Report*
<i>December 1, 2023 – January 15, 2024</i>	<i>Calendar Year 2024</i>	<i>Registration/Renewal</i>
April 1 - April 15, 2024	January 1 - March 31, 2024	2024 1st Quarter Lobbyist Expenditures Report
July 1 - July 15, 2024	April 1 – June 30, 2024	2024 2 nd Quarter Lobbyist Expenditures Report
October 1 – October 15, 2024	July 1 – September 30, 2024	2024 3 rd Quarter Lobbyist Expenditures Report
<i>December 1, 2024 – January 15, 2025</i>	<i>Calendar Year 2025</i>	<i>Registration/Renewal</i>
January 1 - January 15, 2025	October 1 - December 31, 2024	2024 4 th Quarter Lobbyist Expenditures Report

*This report is the **final report** due for Registration Year 2023 for Executive Lobbyists.

APPENDIX 3 – REPORTING TIPS

HELPFUL TIPS AND SOLUTIONS FOR COMMON SCENARIOS FOR REPORTING

1. Examples of Appropriate Lobbyist or Liaison Expenditure Reporting

The following examples illustrate appropriate reporting for meals provided by lobbyist and liaisons:

Note: These examples are also true for Executive lobbyist, however, the recipients will be individuals in state agencies or boards.

Example 1: Shared food and beverages: Legislative lobbyist Zane pays for dinner for legislators Able, Baker, and Charles. Appetizers are ordered for all four diners at a cost of \$40. Two bottles of wine are provided at a total cost of \$100. Able orders a steak at a cost of \$30. Baker orders chicken for \$20 and a dessert for \$7. Charles orders a salad for \$10, a steak for \$40 and a dessert for \$15. Zane’s food cost is \$30. The tax was 8% for a total of \$23.36.

Zane may divide the cost of the appetizer and wine by four (i.e., the total number of participants).

The cost for Able’s meal should be reported as \$70.20, calculated as follows:

Cost of appetizers: $\$40.00/4=\10.00
Cost of wine: $\$100.00/4=\25.00
Cost of entrée: \$30.00
Tax: \$5.20
Total cost: \$70.20

The cost for Baker’s meal should be reported as \$66.96, calculated as follows.

Cost of appetizers: $\$40.00/4=\10.00
Cost of wine: $\$100.00/4=\25.00
Cost of entrée: \$20.00
Cost of dessert: \$7.00
Tax: \$4.96
Total cost: \$66.96

The cost for Charles’s meal should be reported as \$108.00, calculated as follows.

Cost of appetizers: $\$40.00/4=\10.00
Cost of wine: $\$100.00/4=\25.00
Cost of salad: \$10.00
Cost of entrée: \$40.00
Cost of dessert: \$15.00
Tax: \$8.00
Total cost: \$108.00.

For convenience, the total cost of an individual meal may be rounded to the next highest dollar amount. In that case, Able's meal would be reported at \$71.00, Baker's meal at \$67.00 and Charles's meal at \$108.00.

Example 2: Fixed Price Meals. Legislative liaison Woodward buys a box lunch for legislators Inkster, Jackson, Kent, Lemon, and Marx. Each box lunch costs \$12.00. Total tax is \$4.80. Woodward does not order a box lunch for herself. The cost of the meal for Inkster, Jackson, Kent, Lemon and Marx may be calculated as \$12.96 per person or, by rounding, \$13.00 per person.

Example 3: Food and Beverages Only – Less than \$10. Legislative lobbyist Vickers buys legislator Nelson popcorn and a beer during happy hour at a local bar one afternoon. The cost was a total of \$4.00. Vickers did not buy any other such food or beverage for Nelson the balance of the calendar year. This expenditure does not need to be reported because it is under \$10; however, it is important to note that this would not fall under the modest items of food or refreshment category because the lobbyist purchased alcohol for the legislator.

Example 4: Beverages Only - Exceeding \$10. Legislative lobbyist Unger treats legislator Olson to beer at happy hour at a local bar every Monday during the legislative session. The beer costs \$4.00. After the third week, the total expenditure by Unger is \$12.00, exceeding the \$10.00 threshold. Unger reports \$2.00 for that expenditure and reports every such expenditure for legislator Olson thereafter.

2. Examples of Appropriate Lobbyist Principal Expenditure Reporting

The following examples illustrate appropriate reporting for food and beverages provided by lobbyist principals:

Example 1: Group Event with Multiple Sponsors. Lobbyist Principal X and Lobbyist Principal Y equally split the cost of providing box lunches to the Republican House caucus meeting. The cost per box is \$6; however, the overall cost of the caucus meeting is \$150 (\$6 x 25 caucus members = \$150). The Lobbyist Expenditure Report for a lobbyist of each Lobbyist Principal X and Lobbyist Principal Y will report the lobbyist principal expenditure by showing the total cost of the food and beverages at the event that her lobbyist principal paid for as \$75 and report the percentage of the event of which the lobbyist principal paid as 50%.

Example 2: Political Caucus Event, 1 Sponsor: Lobbyist Principal Z provides sandwiches and sodas to the Democratic Senate Caucus for a caucus meeting. The cost per person is \$8, but the total cost is \$200 for the 25 meeting attendees. The lobbyist of Lobbyist Principal Z will report the lobbyist principal expenditure as \$200 at 100% because only Lobbyist Principal Z purchased the food and beverage for the caucus event.

Example 3: Group Event, Committee with Both Committee Members and Non-Member Attendees Receiving a Meal: Lobbyist Principal A bought box lunches for a

legislative committee at \$6 per person. Ten committee members and five legislative staff are assigned to the committee. Logan, a legislative staffer, and Representative Soandso, are not assigned to the meeting, but each go to the meeting and grab a box for themselves. In this case, the lobbyist for Lobbyist Principal A will report by lump sum the lobbyist principal expenditure of \$90 for the committees and staff assigned to the committee. The lobbyist will individually report the \$6 meal under lobbyist expenditures for Logan and a \$6 meal for Representative Soandso.