



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

December 31, 2025

Via email

Oklahoma County Clerk
c/o Lisa Endres, Assistant District Attorney
(lisa.endres@oklahomacounty.org)

Re: Public Access Counselor Complaint No. 2025-059

Dear Counsel,

This is an official advisement regarding the above-referenced complaint ("Complaint") submitted to this office pursuant to 51 O.S.Supp.2025, § 24A.40. The Public Access Counselor ("PAC") received the Complaint on October 3, 2025 from Carol Knight, a private citizen. The Complaint alleges, in relevant part, that the Oklahoma County Clerk ("Clerk") and Oklahoma County Commissioner Brian Maughan ("Commissioner") did not produce documents from The Education and Employment Ministry ("TEEM") upon request from Ms. Knight pursuant to the Open Records Act ("ORA"). According to the Complaint, the Oklahoma County pretrial release program was operated by TEEM as a third-party contractor, and Ms. Knight sought, through the Clerk and the Commissioner, TEEM records of each person supervised by TEEM beginning January 1, 2024.

Per the terms of 51 O.S.Supp.2025, § 24A.40(F), I conducted an initial review and determined the Complaint warranted a response from the Clerk and the Commissioner (collectively, the "County"). The Oklahoma County District Attorney responded on behalf of the County. In the response, the County states that (1) it has no responsive records, and (2) TEEM's own records, even if responsive, are not subject to the ORA.

Upon review of the records provided by the County and consideration of the County's response, I have determined the following:

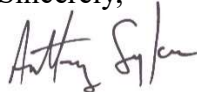
1. The ORA broadly requires public bodies to make records "open to any person for inspection, copying, or mechanical reproduction[.]" 51 O.S.Supp.2025, § 24A.5. The ORA defines records, in pertinent part, as documents or other materials "created by, received by, under the authority of, or coming into the custody, control or possession of public officials, public bodies or their representatives in connection with the transaction of public business, the expenditure of public funds or the administering of public property." *Id.* § 24A.3.
2. The County represented to Ms. Knight and to the PAC that it does not have any records that are responsive to Ms. Knight's request. As noted above, the ORA defines broadly what

records a public body must make available to the public, including those “received by” or in the “custody, control or possession” of the public body. Nevertheless, based on my review I have no reason to doubt the County’s good faith representation that it has no records that are responsive to Ms. Knight’s request.

3. Ms. Knight also appears to argue that TEEM itself must provide access to records. This is not the appropriate venue to make such a determination. The Complaint was made against the County only, and the question of whether TEEM, by virtue of providing services to Oklahoma County, qualifies as a “public body” itself, is complicated and fact-dependent. *See, e.g., 2020 OK AG 2, 2017 OK AG 18, 2002 OK AG 37.*

Based on the information available to me at this time, I conclude that the County’s response to Ms. Knight’s request was reasonable. This conclusion notwithstanding, Ms. Knight has identified a broad category of records regarding services that TEEM provided to Oklahoma County. I would urge the County to once again verify that it has no records that include the information sought by Ms. Knight. However, under 51 O.S.Supp.2025, § 24A.40(G), no further response is required by the County. If you have any questions, please do not hesitate to contact me at (405) 522-2771 or by email at opengov@oag.ok.gov.

Sincerely,



ANTHONY SYKES

*Assistant Attorney General
Public Access Counselor*

cc: Carol Knight (*via email*)