



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

March 9, 2026

Via email

Tulsa Police Department
c/o Becky M. Johnson, Sr. Assistant City Attorney
(beckyjohanson@cityoftulsa.org)

Re: Public Access Counselor Complaint No. 2025-103

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 December 30, 2025, from Jeffrey Karasek, a private citizen. The Complaint alleges that the City of Tulsa ("City") improperly denied multiple requests under the Oklahoma Open Records Act ("ORA") for Tulsa Police Department Internal Affairs investigation materials relating to specific officers. According to the Complaint, the City advised Mr. Karasek that "there are no responsive records releasable under the ORA" but provided no further explanation.

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 City. In its response, the City argues that the records requested by Mr. Karasek, to the extent they exist, relate to an internal personnel investigation and under 51 O.S.Supp.2022, § 24A.7(A) it is within the sole discretion of the public body whether or not to release such records.

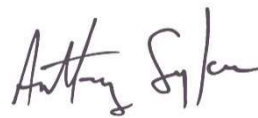
Upon review of the records provided by the City and consideration of the City's response, I have determined the following:

1. Title 51, section 24A.7(A) contains two provisions that permit a public body to withhold access to personnel records. Section 24A.7(A)(1) applies to records "relate[d] to **internal personnel investigations** including examination and selection material for employment, hiring, appointment, promotion, demotion, discipline or resignation[.]" (emphasis added)
2. In his ORA requests to the City, Mr. Karasek sought all records, documents, notes, reports, and communications related to the Internal Affairs investigation of a City officer and the supervisory officer's handling of that investigation.

3. The City may deny public access to these records per the plain terms of Section 24A.7(A). The City has credibly responded that any other documents that must be made public have already been provided to Mr. Karasek.

Based on the information available to me at this time, I conclude that City has good-faith legal basis to deny the Internal Affairs investigation materials relating to specific officers. Under 51 O.S.Supp.2025, § 24A.40(G), no further response to the above-referenced Complaint is required. If you have any follow-up questions, please do not hesitate to contact me at (405) 522-2771 or by email at opengov@oag.ok.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Sykes".

ANTHONY SYKES
Assistant Attorney General
Public Access Counselor

cc: Jeffrey Karasek (*via email*)