



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

April 27, 2026

Via email

City of Tulsa
c/o Kristina L. Gray
(kgray@cityoftulsa.org)

Re: Public Access Counselor Advisement – Complaint No. 2026-024

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 February 10, 2026 from Emily Guffey, an employee of the City of Tulsa. The Complaint alleges that the City of Tulsa (“City”) improperly denied a request under the Oklahoma Open Records Act (“ORA”) for records regarding a personnel investigation, including names of interviewees, interview transcripts, HR recommendations and action taken in response, copies of any disciplinary action against specific employees, and records regarding an investigation into a conflict of interest between two specific employees. Part of the investigation apparently involved Ms. Guffey and, according to the Complaint, the City advised Ms. Guffey that it was not “our practice” to share results with a complainant.

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 requested documents primarily concern internal personnel investigations and that it is not required to provide access to them based on title 51, section 24A.7(A)(1), which allows public bodies to keep certain personnel records confidential.

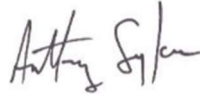
Upon review of the records provided by the City and consideration of the City’s response, I have determined the following:

1. Title 51, section 24A.7(A) contains two provisions that permit a public body, in its sole discretion, to withhold access to personnel records. Relevant here, subsection 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[.]”
2. The City credibly claims that the records requested meet the criteria set forth in 51 O.S.Supp.2022, § 24A.7(A)(1) and, as such, it may deny public access to the records per the plain terms of that provision.

3. To the extent that requested documents fall outside of this category, a search revealed that no responsive records exist.

Based on the information available to me at this time, I conclude that the City has a good-faith legal basis to deny public access to the personnel records. Under title 51, section 24A.40(G), no further response to the above-referenced Complaint is required. 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: Emily Guffey