

OKLAHOMA ETHICS COMMISSION
April 10, 2025
REGULAR MEETING

1. Call to Order.

Upon notice, with the agenda being properly posted at the Commission's office at least twenty-four (24) hours prior to the commencement of the meeting and notice being filed in advance with the Office of the Secretary of State, a special meeting of the Ethics Commission of the State of Oklahoma ["Commission"] was called to order on Thursday, April 10, 2025, at 10:00 am. Chair Eddie Fields ["Fields"] opened the meeting, which was held in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma.

Determination of Quorum.

Roll was called to determine the existence of a quorum for the transaction of business. Commissioners answering present were, Justin Meek["Meek"], Mike Wilt ["Wilt"], Adam Weintraub ["Weintraub"] Eddie Fields ["Fields"]. A quorum of members was declared.

Staff & Visitors.

Commission staff members present at all, or part of the meeting were Executive Director Lee Anne Bruce Boone ["Bruce Boone"], General Counsel Margaret Kerr ["Kerr"], Deputy Director Jeremy Rogers ["Rogers"], Legal Assistant La Shounda Faye and Legal Intern Aniston Emory.

Observing all or part of the meeting: John Rose, Maxim; Scott Glover, RFD Representative; Denise Lawson, Attorney; Erik Dietz, RFD Representative; Dylan Brown, Media; Undrell Mahoney, Media; Bennett Brinkman, Media; Paul Monies, Media; HJ Reed, OKSPA; and Nolan Clay; Media.

2. Open Meeting Act Compliance.

Chair Fields reviewed the *Affidavit of Posting* and affirmed compliance with the Oklahoma Open Meeting Act.

3. Introductions and Announcements.

[Bruce Boone] No announcements.

4. Announcements, consideration, discussion and possible action on the disqualification or recusal of a Commissioner or Commissioners pursuant to Ethics Rule 1.6 for any matter listed on the Commission agenda.

No additional recusals.

5. **Consideration, discussion, and possible action on minutes for the regular meeting and executive session held March 13, 2025.**

Motion: Commissioner Weintraub moved to approve the minutes for the regular meeting and executive session held March 13, 2025.

Second: Commissioner Wilt.

Roll Call vote: Johnson – Absent, Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

6. **Executive Director's Report**

a. **Compliance Update**

Executive Director Bruce Boone noted that the Commission is currently in the midst of Special Election season and less than 3% of the required reports have been filed late. Personal Financial Disclosures are currently about 55% completion; however, filing will increase closer to the due date of May 15, 2025. Boone will work with her team to ensure reminders are sent out in advance. Last month, the Compliance Officers handled approximately 800 interactions, including in-person meetings, emails, calls, and training sessions. The Commission is tracking more detailed data internally to support the development of a FAQ section on its website. Boone also highlighted the positive feedback received from the legislature regarding the Compliance Officers' work. Last month's late filings of compliance reports: 3% of lobbyist expenditure reports, 7% of committee 4th Quarter Reports, and 15% of Special Election Reports were filed late.

b. **LOFT Update**

- i. Executive Director Bruce Boone explained that each month she intends to present an update or recommendation from the LOFT report to the Commissioners. An internal LOFT committee has been established and will meet at least once a month to discuss implementing these recommendations. Subject matter experts have been assigned to each recommendation, and accountability markers have been established to ensure progress. Bruce Boone highlighted two specific recommendations from LOFT:
 1. Notice of Allegations to be sent with a subpoena. In civil litigation, a subpoena can be issued once the case is filed, but under Rule 6.10 a case is not authorized until the end of the investigation, and after subpoena power is invoked. Even though the process is different, a Notice be provided to a respondent to provide substantial information. A sample *Notice of Subpoena*, which will accompany future subpoenas issued, was displayed to the Commission and no objections were raised. This will provide some context to the respondent of any subpoena that is issued.

2. Recommendation to provide a reason for dismissing a case or complaint. Research was conducted on how previous Commissioners and other states address dismissals. Including the rationale for dismissals would enhance transparency and public understanding. The Commission will begin using this proposed language starting with the current meeting.

c. Legislative Update

Executive Director Bruce Boone reported that the Request Bill has been consolidated into Senate Bill 890, which was heard in the House Elections and Ethics Committee and passed unanimously this week. Although both the House and Senate versions of the bill went through committee, the Senate Bill progressed more quickly and included the most up-to-date language and amendments, making it the preferred version to advance. The bill now needs to go through the Oversight Committee with the House before proceeding to the House Floor. Bruce Boone expressed her gratitude for the sponsorship of Senator Daniels and Representative Osburn. There are no other bills of concern currently being monitored, aside from one bill (HB2164) requiring Ethics training for state officers and appointees within one year of their appointment.

d. Budget Update

Executive Director Bruce Boone discussed the current budget for the year and noted that she has been in ongoing discussions with OMES to determine the exact accounting of Funds. Once confirmed, she may recommend allocating a portion of the Funds for maintenance of the Guardian System in the upcoming year, if acceptable. Boone also addressed a letter received by all state agencies from the Appropriations Chairs regarding a proposed 2% budget cut. This would equal \$22,000.00, and Boone assured the Commission of sufficient funds to cover the 2% if there were to be a revenue failure this year. No answer has been received about whether this will happen or not.

e. Guardian System Update

- i. Executive Director Bruce Boone introduced John Rose from Maxim, acknowledging his key role in advancing the project. Boone also recognized staff members Darci Ray [Admin. Programs Manager], Denise Klein [Director of Compliance], and Jeremy Rogers [Deputy Director] for their efforts in documenting system usage and requirements. Daily PDF batch runs every night, including weekends, to ensure data is available for migration to the new system. Bruce Boone highlighted the significant volume of weekly work being done on this project.

7. Presentation and demonstration by representatives of RFD & Associates, Inc. of Guardian 2.0, the new customized online filing system for the Ethics Commission. Chair Fields.

- i. Director Bruce Boone introduced Scott Glover (COO) and Erik Dietz (Application Development) from RFD, who are leading the development of the Guardian 2.0 system. The project began in January 2025 with a planned Go-Live date of July 2025, providing only six months to complete what is typically a 9–12-month project. The development is split into two phases: Phase 1 focuses on public filing and user experience; Phase 2 includes add-ons and system navigation features and is anticipated to continue from July through the end of 2025. Key challenges include the tight timeline and delayed data delivery, which was expected in January but was not received until March 19th. RFD’s team has grown to 17 members, including developers and cloud specialists. Progress is on track, and while no contingency plans are in place, a functional system is expected by July. Testing will include a two-week UAT period, with continued support post-launch.

8. Consideration, discussion and possible action on proposed rule change to Rule 2.69, as submitted by Mitchell Jacob, candidate for State Representative. Chair Fields.

General Counsel Kerr addressed a proposed Rule change prompted by an ALJ hearing the previous month. Mr. Jacob found Rule 2.69 confusing, suggesting the term "dissolved" be replaced with "closed." The Commissioners reviewed the proposed change and the current Rule 2.69, discussed the matter and determined Rule 2.69 was not a confusing Rule. Kerr suggested a memo could clarify the rules.

Motion: Commissioner Weintraub proposed handling Rule 2.69 internally and suggested that a staff memo or Commission comment be prepared to address the issue.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

9. **Proposed Executive Session.** Consideration, discussion, and possible action to enter Executive Session, as authorized by 25 O.S. 2021, § 307 (B)(1,4, & 7), for the purpose of having confidential communications between the Commission and its counsel, regarding i-iii below about pending investigations, claims, or actions; and to discuss matters for which disclosure would violate confidentiality under Ethics Rules 6.5 and 6.9. Chair Fields.
 - i. Case No. 2024-03, alleging violations of Ethics Rule 2, Campaign Finance.
 - ii. Case No. 2024-11 alleging violations of Ethics Rule 2, Campaign Finance.
 - iii. Complaint Numbers:

C-25-03
C-25-05
C-25-06
C-25-07

Statement by Attorney: The information to be discussed in Executive Session requires confidential communications between the Ethics Commission and its attorney (s) concerning pending investigations, claims, or actions, the disclosure of which would seriously impair the ability of the Ethics Commission to process the claim or conduct a pending investigation, litigation, or proceeding in the public interest or violate confidentially requirements under Ethics Rules 6.5 and 6.9.

xii. **Action to enter Executive Session.**

Motion: Commissioner Weintraub moved, pursuant to counsel's advice, to enter closed executive session in room G-3 of the State Capitol Building to discuss the matters listed on agenda item 12.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried to go into Executive/Close session at 11:10 am.

xii. **Action to Exit Executive Session.**

Motion: Commissioner Meek moved to return to Open Session at 1:26 pm.

Second: Commissioner Weintraub

Roll Call Vote: Wilt – yes, Weintraub – yes, Meek – yes, Fields – yes

Motion Carried.

xii. Possible action on the numbered matters above discussed in Executive Session. *Prior to taking action, the Commissioners may consider, discuss, and act on the disqualification or recusal of a Commissioner or Commissioners pursuant to Ethics Rule 1.6 for any item listed in this agenda for Executive Session. Maragret Kerr, General Counsel.*

- i. Prior to the meeting, there were no recusals. Seeing no additional recusals.
- ii. Consideration of authorizing possible action regarding the following cases:

Chair Comment: Case No. 2024-11 and Complaint C-25-07 continued to a future

meeting.

Second: Commissioner Wilt

Roll Call Vote: Johnson – yes, Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

Motion: Commissioner Weintraub moved pursuant to Ethics Rule 2 Campaign Finance, to authorize the Executive Director to proceed with settlement negotiations in Case No. 2024-03 as discussed in Executive Session.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss Complaint **C-25-03** alleging violations of Rule 2, Campaign Finance because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss Complaint **C-25-05** alleging violations of Rule 6.7, because there is not reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss Complaint **C-25-06** alleging violations of Rule 6.7, because there is no reasonable cause to believe that violations of the Ethics Rules have occurred.

Second: Commissioner Wilt

Roll Call Vote: Meek – yes, Wilt – yes, Weintraub – yes, Fields – yes

Motion Carried

13. **New Business. Chair Fields**

No new business.

14. **Adjournment. Chair Fields**

Motion: Commissioner Wilt moved to adjourn the meeting.

Second: Commissioner Weintraub

Roll Call Vote: Meek – yes, Weintraub – yes, Wilt – yes, Fields – yes

Motion Carried.

Meeting ended at 1:29 pm

LeeAnne Bruce Boone

LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

Eddie Fields

EDDIE FIELDS, Chair