

OKLAHOMA ETHICS COMMISSION
MARCH 13, 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, March 13, 2025, at 10:00am. 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, Howard Johnson ["Johnson"], 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 ["Faye"], Compliance Officer Tyler Fixley ["Fixley"], and Assistant Compliance Officer Kayla Brasel ["Brasel"].

Observing all or part of the meeting: Melissa Jacques, Tulsa World; Nolan Clay, Media; Bennett Brinkman, Journalist; Denise Lawson, Attorney; Diana Duran, LegisOK; Ben Anderson, Media; Kilee Thomas, Media; Joseph Pieze, Senate; Paige Taylor, Media; Kevin Josefu, Media; and Dylan Brna, KFOR 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] announced that La Shounda Faye is the new Executive Assistant for the Ethics Commission.

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 January 16, 2025.**

Motion: Commissioner Weintraub moved to approve the minutes for the regular meeting and executive session held January 16, 2025.

Second: Commissioner Wilt.

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

Motion Carried.

1. **Executive Director's Report**

a. **Compliance Update**

- i. Executive Director Bruce Boone discussed that we have been making some adjustments to the compliance report to make it more goal-oriented. Less than 7% of reports recently filed were filed late, so that's 93% compliance. We've got a more active reporting schedule due to the three special elections.
- ii. In reviewing the personal financial disclosures, we're almost halfway to compliance. The due date is in May, and a lot of people are getting those filed early which is a good start.
- iii. Our compliance team has put together a compliance activity tracker which will be included in the monthly compliance report. This tracks callers, walk-in clients and reports reviewed and nearly 400 reports were reviewed through January during the reporting period for LOFT.

b. **LOFT Update**

- i. Executive Director Bruce Boone explained that the LOFT report became available March 6th and was an historical report that covered the past ten years. Without a doubt, the lack of resources in previous years did hamper the Commission's ability to manage its work, and that definitely was demonstrated throughout the report. The additional funding and resources in this year's budget that the legislature and the governor appropriated have provided an avenue for

us to move forward with a much different approach, but it will take time and focused energy to right the course. We can't change our trajectory overnight, we're going to utilize it to continue to refine the direction of the commission and the priorities that you, as commissioners have. I think there are some suggestions that we're already either in the process of implementation or that we are going to implement in the very near future.

- ii. First, we are planning to implement a case management system. It's something that we have been talking about internally, prior to this, and we had already reached out to a potential vendor. Our priority, of course, is our campaign finance software system. But the case management system is something that was suggested by LOFT. We do have funding in our budget to pay for this.
- iii. The second big thing I'd highlight is regarding our compliance area. After some discussions last year at the COGEL conference and meeting with other states and then, listening to some of the ideas that our Direct of Compliance has, we were thinking about refining our process of reviewing campaign finance documents. So, we will be looking at trying to look at the bulk of the documents, perhaps trying to categorize them in terms of like red, yellow, green. So, we'll be looking at the states that are doing that and then utilizing that system to perhaps do more in-depth audits in the future.
- iv. We will be creating an annual report. If you all recall, in December, I did an annual review for the commission at our public meeting. But we want to do something that's a little more structured with key performance metrics and perhaps publish that in the future. I think that's a great way to ensure that we're focusing on our mission, but also to increase transparency and public trust in government. So, be looking for that as we head towards the end of the year and then increase the number of trainings that we offer. You know that's been a huge focus of the commission. Over the past year, we've increased training by over 650%, considering where we were, only holding two. I do believe we have trainings scheduled for next quarter.

c. Budget Update

- i. Executive Director Bruce Boone discussed our budget. We've had budget hearings in both the Senate and the House with a favorable response and interest in what we were doing. In dissecting our budget with OEMS and LOFT we found we have a large amount of funds in our 200 Fund. So, in that 200 fund, you'll see that we have almost \$640,000. After \$150,000 is collected any remaining funds must by statute spill over into our 211 Fund. Which was set up as a technology fund. The \$640,000 was a buildup of funds over the last 4 to 5 years. These funds have not been appropriated. Unsure why the commission has

never done that. We should consider utilizing that for some one-time funding for our system expenses, rather than relying on the legislature to appropriate the full \$1 million. I think we can revise our request and utilize some of those funds, perhaps \$500,000.

d. Legislative Update

- i. Executive Director Bruce Boone explained House Bill 2109 and Senate Bill 890 have both passed out of their legislative committees. And are awaiting hearing on the floor. The only concern being, do we have funding to take care of political subdivisions. Other Bills impacting the legislation right now is, Senator Hayes and Representative Phifer have a Bill that would require one hour of ethics training for newly appointed state officers, appointed or elected either one. And they would have to do that within a 12-month period. We're prepared to do that. We are fully supportive of that Bill. And it does appear to be moving. Throughout both sides of the legislature. Do anticipate that it will pass. Senator Kirk's bill that requests 4 hours of training does not seem to have moved on either side.

e. Advisory Opinions

- i. Executive Director Bruce Boone discussed there are several pending requests some dating back almost ten years; We recommend that these can be handled through either informal opinion, informal guidance, or through a staff memorandum. We have had several requests regarding cryptocurrencies or digital currencies; a staff memorandum will be issued.

f. Guardian System Update

- i. Executive Director Bruce Boone discussed that we do anticipate the delivery of our data and a data dictionary from our current system to the new vendor. We plan to send out updates via, GovDelivery over the next quarter to advise people utilizing the system of the upcoming changes to come and to alert them of the blackout periods just before we open up the new system on July 1st, because there might be issues with a data transfer, typically when you are shutting down one system and opening up a new one issues do occur. We believe we are on track.

6. Consideration, discussion, and possible action on new name for Guardian System Replacement. Chair Fields.

Motion: Commissioners Weintraub moved to approve the name Guardian 2.0 for the Guardian System Replacement.

Second: Commissioner Johnson

Roll Call Vote: Johnson – yes, Meek – no, Wilt – yes, Weintraub– yes, Fields – yes

7. **Presentation on AdImpact, a political advertising and activity tracking system. Deputy Director Jeremy Rogers.**

- i. Deputy Director Jeremy Rogers discussed AdImpact, showing that it consists of political advertising activity monitoring system. AdImpact is also willing to permit the Ethics Commission to share limited advertising information with the public via the Ethics Website. AdImpact is currently providing special pricing to government entities. It's a two-year cycle agreement at \$12,000 for two users. It would give access to two users on our staff to be able to utilize the system and also include an automated export from their system for public transparency of campaign advertisements in Oklahoma.

8. **Consideration, discussion, and possible action to purchase AdImpact system as in the best interest of the Commission. Chair Fields.**

Motion: Commissioner Johnson moved to approve the purchase of the AdImpact system for the Ethics Commission and to authorize the Executive Director to execute the contract for said system.

Second: Commissioner Meek

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

9. **Consideration, discussion and possible action to adjust the individual contribution limit to candidate committees for the 2026 election cycle in accordance with the consumer price index as set fourth in Ethics Rule 2.37, which increases the limit from \$3,300 to \$3,500. Chair Fields.**

Motion: Commissioner Wilt moved to adjust the individual contribution limit to candidate committees for the 2026 election cycle in accordance with the consumer price index as set forth in Ethics Rule 2.37, which increases the limit from \$3,300 to \$3,500.

Second: Commissioner Meek

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

10. **Consideration, discussion and possible action to submit a request to the Attorney General's office for an Opinion related to application of the Ethics Rules. Chair Fields.**

Director Bruce Boone presented information that a party to one of our cases has disputed the application of our Rules to state officers and employees after they leave office. Bruce Boone stated that the Ethics Commission has always taken the position that a state officer or employee is accountable for any rule violations after they leave their office or employment, for any rule violations that occurred while they were in office or employed by the state, up to the time limit to bring an action (4 years). We believe obtaining an Attorney General opinion would resolve any uncertainty.

Motion: Commissioner Weintraub moved to authorize the Executive Director to submit a request to the Attorney General's office for an opinion related to application of the Ethics Rules as discussed.

Second: Commissioner Meek

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

Motion Carried.

11. 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-x. 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. 2024-37 combined with 2024-27, alleging violations of Ethics Rule 2, Campaign Finance.
 - iii. Case No. 2022-26 alleging violations of Ethics Rule 2, Campaign Finance.
 - iv. Case No. 2024-33 combined with 2024-34, alleging violations of Ethics Rule 4, Conflicts of Interest.
 - v. Case No. 2022-38, alleging violations of Ethics Rule 2, Campaign Finance.
 - vi. Case No, 2022-43, alleging violations of Ethics Rule 2, Campaign Finance.
 - vii. Case No. 2022-12 alleging violations of Ethics Rule 2, Campaign Finance.
 - viii. Case No. 2023-10 combined with 2024-35, alleging violations of Ethics Rule 5, Lobbyist Registration and Reporting.
 - ix. Case No. 2022-25 alleging violation of Ethics Rule 2, Campaign Finance.
 - x. Complaint Numbers:
 - C-25-02
 - C-25-01
 - C-24-39
 - C-24-40
 - C-24-25

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.

xi. **Action to enter Executive Session.**

Motion: Commissioner Meek 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 Johnson

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

Motion Carried to go into Executive/Close session at 10:55 am.

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

Motion: Commissioner Johnson moved to return to open session at 1:48 pm

Second: Commissioner Wilt

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

Motion: Commissioner Weintraub moved pursuant to Ethics Rule 6.10 to authorize the Executive Director to proceed with **Case No. 2024-03** as discussed in Executive Session

and pursue prosecution in District Court.

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 6.10, to approve the proposed Settlement Agreement in Case no. **2024-37** combined with **2023-27** and authorize the Executive Director to execute the Agreement, as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss Case No. **2022-26** alleging violations of Rule 2, Campaign Finance but allow the Executive Director to resolve pending compliance orders Administratively.

Second: Commissioner Meek

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

Motion Carried.

Motion: Commissioner Weintraub Moved to Dismiss Case No. **2022-38**.

Second: Commissioner Wilt

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

Motion Carried.

Motion: Commissioner Weintraub Moved to Dismiss Case No. **2022-43** alleging violations of Rule 2, Campaign Finance but allow the Executive Director to resolve pending compliance orders Administratively.

Second: Commissioner Johnson

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

Motion Carried

Motion: Commissioner Weintraub Moved to pursuant to Ethics Rule 6.10, to engage in a Settlement Agreement in Case No. **2022-12** and authorized the Executive Director to proceed as discussed in Executive Session.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved to Dismiss Case No. **2022-10 combined with 2024-35**.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Weintraub moved pursuant to Ethics Rule to combine Complaint **C-25-02 with Case No. 2024-37 and 2023-27** and authorize the Executive Director to proceed as discussed in Executive Session.

Second: Commissioner Meek

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

Motion Carried.

Motion: Commissioner Weintraub Moved to Dismiss Complaint **C-25-01** and proceed as discussed in Executive Session.

Second: Commissioner Meek

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

Motion Carried.

Motion: Commissioner Weintraub Moved to Dismiss Complaint **C-24-39**.

Second: Commissioner Johnson

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

Motion: Commissioner Weintraub Moved to Dismiss Complaint C-24-25.

Second: Commissioner Johnson

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

13. **New Business. Chair Fields**

No new business.

14. **Adjournment. Chair Fields**

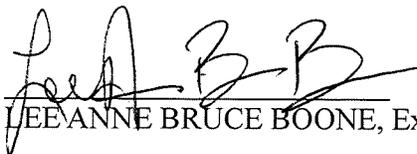
Motion: Commissioner Wilt moved to adjourn the meeting.

Second: Commissioner Meek

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

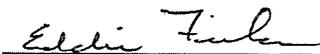
Motion Carried.

Meeting ended at 1:57 pm



LEEANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



EDDIE FIELDS, Chair