

OKLAHOMA ETHICS COMMISSION

September 11, 2025

Regular Meeting

1. Call to Order.

Chair Justin Meek [“Meek”] called to order the meeting of the Ethics Commission of the State of Oklahoma [“Commission”] on Thursday, September 11, 2025, at 10:00 am. in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma, after confirming the agenda and notice having properly been given.

Determination of Quorum.

Roll was called to determine the existence of a quorum. Commissioners present were Howard Johnson [“Johnson”], Vice Chair Adam Weintraub [“Weintraub”], and Chair Justin Meek [“Meek”]. A quorum of members was declared.

Staff & Visitors.

Commission staff members present 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 Compliance Officer Kayla Brasel.

Observing all or part of the meeting: Erik Parker, Media; H.J. Reed, OKSPA; Emma Murphy, Media; Dylan Brown, Media; Undrell Mahomes, Media; Brett Robinson, Lobbyist; Andrea Hancock, Media; Alex Gladden, Media; and Danny Williams, Representative.

2. Open Meeting Act Compliance.

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

3. Introductions and Announcements.

[Chair Meek] 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 special meeting and executive session held August 14, 2025. [Chair Meek]

Motion: Commissioner Johnson moved to approve the minutes for the special meeting and executive session held on August 14, 2025.

Second: Vice Chair Weintraub

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

Motion Carried

6. Executive Director’s Report

a. Compliance Update

Executive Director Bruce Boone stated that report review letters will be sent out this Friday. Activity for all compliance officers has now been listed. After the October reporting deadline, there will be no state-level candidate or lobbyist reporting until January, providing a break to implement and acclimate users to the new Guardian 2.0 system. This also allows staff to focus on political subdivisions ahead of the November 1, 2025, reporting deadline.

b. Budget Update

Executive Director Bruce Boone mentioned that the Commission 191 fund has been closed out as these funds were used for a statewide marketing campaign last month to make awareness about the updates to the political subdivision reporting. All other funds are on course for FY26.

c. Guardian System Update

Executive Director Bruce Boone reported that Guardian 2.0 was anticipated to go live the first week of September but now could extend that date to the end of this month. She stated how we have the opportunity to do another data pull from Civix and allowed for more data conversion testing. Executive Director Bruce Boone anticipates being able to come up the week of September 22, 2025. She stated how this would give us continued access to the Civix System for a week before it shuts down on October 1, 2025. She states how they plan to shut down the Guardian on September 19, 2025. Executive Director Bruce Boone also announced that they have been having people test internally and externally and that they were going to throw it out to the public to help with the testing with an RSVP. She also mentioned trying to get out training dates for October.

Question from Danny Williams noted that the current Guardian System is difficult to navigate. He asked whether Guardian 2.0 could be simplified?

Question from Chair Meek asked if adjustment could be made at this point?

Comment by Executive Director Bruce Boone stated that the goal of Guardian 2.0 is to make the system more user-friendly and easier to comply with, noting that others have raised the same concern.

d. LOFT Update

Executive Director Bruce Boone stated that the overall goal for the Commission is additional transparency, and Deputy Director Rogers has partnered with the Corporation Commission to get both the complaint and open records request forms online; and she publicly commended the Corporations Commission for how helpful they have been.

Deputy Director Rogers walked the commission through the changes that have been made to make additional options and forms online.

Executive Director Bruce Boone discussed LOFT's recommendation to include administrative actions from compliance orders on the website. During 2025, there were 236 compliance orders, with lobbyists being the most frequent violators. She noted efforts to clear old, outstanding orders and emphasized the importance of maintaining accountability by tracking repeat offenders.

Comment by Executive Director Bruce Boone for feedback on whether the Commission should list three-time offenders online.

Comment by Commissioner Johnson that he would like the Commission to first reach out to three-time offenders before doing so.

Chair Meek echoed Commissioner Johnson's remarks stating that the Commission should first review and pursue repeat offenders.

Questions from Vice Chair Weintraub whether this matter would require a vote?

Comment by General Counsel Kerr stated that this matter would not require a vote.

e. Rules Working Groups

Executive Director Bruce Boone shared that they held their first meeting with House legislators, discussing Commission rules, particularly on federal agent registration and gathering feedback. The goal is to involve those the Commission serves and regulates, giving them a voice in the process. They are currently awaiting responses on who is able and willing to serve.

f. Political Subdivision Update

Executive Director Bruce Boone provided an update on the marketing contract with Candor and noted that the statewide campaign preparation launched within the past few weeks. Candor, the selected vendor, is highly skilled in digital media and is enthusiastic about spreading the word across the state. She shared a one-page document developed with Candor and noted the positive feedback.

7. Introduction and explanation of a rulemaking request submitted by Ethics Commission Staff regarding the 90-day provision for surplus funds in AO 2019-01, Rules 2.48 and 2.116.

Executive Director Bruce Boone explained that she has mentioned this in previous meetings that they have had some concerns with conflicts with advisory opinions. She further explained how this issue kept coming up and how there is some conflict between the two rules and the advisory opinion. She stated how she would like to get the Commission's authority to propose some rule making regarding this conflict with the rules so that they can get something with more clarity out there.

Motion: Vice Chair Weintraub moved to authorize the Staff to begin the rulemaking process related to the 90-day provision for surplus funds.

Second: Commissioner Johnson

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

Motion Carried

8. Consideration, discussion, and possible action on proposed Advisory Opinion Request AOR 2025-03 from Representative Judd Storm, regarding whether a candidate committee must open a new bank account when the candidate is running for a subsequent term for the same office.

Executive Director Bruce Boone explained that they met with legislators to get feedback on rules, specifically about whether a candidate committee must open a new bank account when running for a subsequent term in the same office. Legislators asked if they could keep the same account under a more generic name while continuing with the same reporting. Executive Director Bruce Boone noted there may be room for clarification in the rule but emphasized the importance of transparency and avoiding unnecessary complications. She suggested the issue could be addressed through an advisory opinion, though it won't be on next month's agenda.

Motion: Vice Chair Weintraub moved to direct the Staff to engage in the process of an Advisory Opinion for AOR 2025-03 regarding whether a candidate committee must open a new bank account when the candidate is running for a subsequent term for the same office.

Second: Commissioner Johnson

Roll Call Vote: Johnson - yes, Weintraub - yes, Meek -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-v 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.
- i. Case No. 2022-25 alleging violations of Campaign Finance Ethics Rules 2; *State of Oklahoma ex rel. Oklahoma Ethics Commission v. Pittman*, Oklahoma County District Court, Case No. CJ-2025-_____.
 - ii. Case No. 2024-5 alleging violations of Ethics Rule 2 and 3, Campaign Finance and Financial Disclosure.
 - iii. Case No. 2025-14 alleging violations of Ethics Rule 2, Campaign Finance.
 - iv. Case No. 2025-12 alleging violations of Ethics Rule 2, Campaign Finance.
 - v. Complaint Number(s): C-25-16

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.

vi. **Action to enter Executive Session.**

Motion: Commissioner Johnson moved to enter closed, executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 9.

Second: Vice Chair Weintraub

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

Motion Carried to go into Executive/Close session at 10:46 am.

vii. **Action to Exit Executive Session.**

Motion: Commissioner Johnson moved to return to Open Session at **12:16 pm**.

Second: Vice Chair Weintraub

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

Motion Carried.

- 10.** Possible action on the numbered matters discussed above 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. Margaret Kerr, General Counsel.*

Motion: Vice Chair Weintraub moved pursuant to Rule 6.10, to authorize the Executive Director to submit the counteroffer of settlement to Respondents as discussed in Executive Session **Case No. 2024-5**.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Vice Chair Weintraub moved to dismiss **Case No. 2025-12**, alleging violations of Rule 2-Campaign Finance for respondents' full compliance and willingness to take immediate corrective action and issue a private reprimand letter.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Vice Chair Weintraub moved to dismiss Complaint **C-25-16**, because there is no reasonable cause to believe that violations of Ethics Rules has occurred.

Second: Commissioner Johnson

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

Motion Carried.

Statement by Chair Meek: Chair Meek, the Commission will not be taking any action today on the following cases and/or complaints that were discussed in Executive Session: **Case No. 2022-25, Case No. 2025-14**.

11. New Business. Under Oklahoma Statute 25 O.S. § 311(A)(9), new business is limited to any matter not known or which could not have been reasonably foreseen prior to the time of posting of this agenda. Chair Meek

[No new Business]

12. Adjournment. Chair Meek

Motion: Commissioner Johnson moved to adjourn the meeting.

Second: Vice Chair Weintraub

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

Motion Carried.

Meeting ended at 12:21 pm.



LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:



JUSTIN MEEK, Chair