

**OKLAHOMA ETHICS COMMISSION**  
**May 1, 2025**  
**SPECIAL 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, May 1, 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, 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 and Compliance Officer Tyler Fixley.

**Observing all or part of the meeting:** Diana Duran, Legislature OK; James Dennis, Public; Paul Monies, Media; Josph Pierce, Senate; Jim Lemons; Nolan Clay, Media; Sasha Ndisabiye, Media; David Gleason, Attorney.

**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 April 10, 2025.**

**Motion:** Commissioner Weintraub moved to approve the minutes for the regular meeting and executive session held April 10, 2025.

**Second:** Commissioner Wilt.

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

**Motion Carried.**

6. **Executive Director’s Report**

a. **Compliance Update**

Executive Director Bruce Boone reported that due to the earlier meeting date, data is only available through the beginning of the week. She gave an update on the Compliance Activity tracker that tracks the compliance officer’s activity each month. She provided an overview of the data collected concerning Frequently Asked Questions (FAQs). Executive Director Bruce Boone also highlighted the upcoming deadline for Personal Financial Disclosures (PFDs), emphasizing that a substantial number of filings remain outstanding. She anticipates a significant increase in submissions over the next few weeks, which is expected to be reflected in the data presented at the next Commission meeting.

b. **Legislative Update**

Executive Director Bruce Boone explained that Senate Bill 890, authored by Senator Daniels and Representative Osburn, with additional co-authors Senator Kirt and Representative Deck, changes the filers responsibilities for political subdivisions, designating the Ethics Commission as the new repository starting November 2025. The bill has passed both the House and Senate and is now headed to the Governor for signature.

b. **Budget Update**

Executive Director Bruce Boone provided an update on next year’s budget, noting that the Commission has not received regular monthly budget numbers from OMES due to a rescheduled meeting. She highlighted the Budget Transparency Portal launched by the House and that the Senate has recently joined by adding its numbers last week. Regarding the replacement of the Guardian System with Guardian 2.0, the Commission determined that the full \$1.2 million originally allocated was not necessary and instead requested \$1 million. Executive Director Bruce Boone also noted that last year’s one-time funding for Political Subdivisions was not requested again this year; instead, the Commission has proposed converting it into recurring \$300,000 annual

funding. While this is a starting point, additional funding will be necessary in the future. Compared to state candidate races, Political Subdivision matters are three to four times more numerous than what the Commission is currently managing. To address this, the Commission plans a staggered implementation along with extensive educational efforts to ensure Compliance is fully prepared. The House and Senate are currently in different positions on several aspects of the budget. Executive Director Bruce Boone has held discussions with leadership from both House and the Senate, who understand the Commission's current needs and challenges. However, many moving parts remain, and discussions are ongoing throughout May as the final budget numbers are still being determined.

- i. Question from Commissioner Wilt how did you arrive at that \$300,000 figure for the subdivision enforcement?
- ii. Comment by Executive Director Bruce Boone took the number from last year and doubled it knowing recurring funding will be needed to hire full-time personnel. This would include education, travel and two full-time positions. That number would increase if the Commission took on all the subdivisions.

#### **d. Guardian System Update**

Executive Director Bruce Boone provided an update on the Guardian 2.0 System, noting progress and delays. The main issue has been with Power BI, particularly in data interpretation and presentation. After some delays in coordination with OMES, progress is now back on track. While there may be initial delays in public-facing reporting, the system can still be operational. All data from Civix has been received, and user testing is expected to begin in the coming weeks. Additionally, Executive Director Bruce Boone presented the new Guardian 2.0 logo.

#### **e. AdImpact System Update**

Executive Director Bruce Boone announced that the contract with AdImpact has been signed, and implementation is expected within weeks. AdImpact will serve as a data source for internal investigations and reporting, as well as a public tool to show how money is being spent on media during current elections.

#### **f. LOFT Update**

Executive Director Bruce Boone addressed a LOFT recommendation suggesting the Commission delay formal investigations during the legislative session. After some research by General Counsel Kerr and consultation with other states, it was found that no other State postpones

investigations during session. The Commissioners commented that the Ethics Commission should also continue conducting investigations during the legislative session.

Question from Commissioner Wilt: What is the rationale for this request?

Comment by Executive Director Bruce Boone: LOFT interviewed both past and present legislators.

Comment by Chair Fields This seems to have come up during those interviews.

Question from Commissioner Weintraub is this because they would be dealing with other things during session?

Comment by Executive Director Bruce Boone stated that it is one of the reasons. She explained that the Commission is very lenient when it comes to giving extensions and working with the legislators during legislative session.

**7. Consideration, discussion, and possible action on the Strategic Plan for the Ethics Commission. Chair Fields.**

Director Bruce Boone discussed LOFT's recommendation to implement a Strategic Plan aligned with existing priorities set by Executive Director Bruce Boone. Many of the suggestions mirrored the efforts the Commission had already begun, emphasizing a shared focus on transparency and accountability. The newly developed Strategic Plan outlines key initiatives, with Education as a top priority. The plan highlights three main initiatives:

- i. Annual Reports with clear, data-driven metrics published online for public transparency.
- ii. Uniform Public Disclosure Policy for standardizing the release of complaints and investigations, which was implemented during the April 10, 2025, Commission Meeting.
- iii. Advisory Group to provide public input and recommendations, meeting quarterly in an advisory-only capacity, targeted for launch by October 2025.

**Motion:** Commissioner Wilt moved to approve the Strategic Plan as presented by the Executive Director.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**8. Presentation and discussion regarding the request to the Attorney General's office for Opinion, and the Attorney General's Opinion Number 2025-05 dated April 23, 2025, as it relates to application of the Ethics Rules. Chair Fields.**

Executive Director Bruce Boone explained that the Attorney General's office responded to the Commission's question regarding the following question: "Are state officers and employees subject to the jurisdiction of the Ethics Commission after leaving their office or position with the State, for actions taken (or failure to act) while they were a State officer or employee, up to the time limit for enforcement?" The Attorney General affirmed the questions submitted, offering three justifications: (1) the term "shall investigate" obligates the Commission to pursue alleged ethics violations; (2) the only current limitation on the Commission's authority is the four-year statute of limitations for filing a civil action; and (3) the Commission holds implied authority to investigate and prosecute former officials in order to fulfill its constitutionally mandated responsibilities.

**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. 2024-33/2024-34 alleging violations of Ethics Rule 4, Conflict of Interest.
- iii. Case No. 2024-32 alleging violations of Ethics Rule 4, Conflicts of Interest.
- iv. Complaint Numbers:  
C-25-04  
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.

**v. Action to enter Executive Session.**

**Motion:** Commissioner Wilt moved, pursuant to counsel's advice, to enter closed executive session in room G-3 of the State Capitol to discuss the matters listed on agenda item 9.

**Second:** Commissioner Meek

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

**Motion Carried to go into Executive/Close session at 10:44 am.**

vi. **Action to Exit Executive Session.**

**Motion:** Commissioner Johnson moved to return to Open Session at 12:39 pm.

**Second:** Commissioner Wilt

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

**Motion Carried.**

vii. 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 two recusals. We see no additional recusals.

ii. Commissioner Meek and Wilt are recused from the following Case No. 2024-33/2024-34 and Complaint C-25-04.

**Motion:** Commissioner Weintraub moved to accept the Settlement Offer as discussed in Executive Session for **Case No. 2024-03**, alleging violations of Rule 2- Campaign Finance.

**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. 2024-33/2024-34**, alleging violations of Rule 4-Conflicts of Interest, and release the Public Statement as discussed in Executive Session for education and transparency purposes.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Motion:** Commissioner Weintraub moved, pursuant to Rule 6.10, to authorize the Executive Director to proceed with **Case No. 2024-32** and pursue prosecution in District Court.

**Second:** Commissioner Johnson

**Roll Call Vote:** Meek – yes, Wilt – yes, Johnson – yes, Weintraub – yes, Field-yes

**Motion Carried**

**Motion:** Commissioner Weintraub moved to Dismiss **Complaint C-25-04**, because there is not reasonable cause to believe that violations of the Ethics Rules have occurred.

**Second:** Commissioner Johnson

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

**Motion Carried**

**Motion:** Commissioner Weintraub moved to Dismiss **Complaint C-25-07**, because there is not reasonable cause to believe that violations of the Ethics Rules have occurred. For the purpose of transparency and education and further moves to provide a public statement as discussed in Executive Session.

**Second:** Commissioner Meek

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

**Motion Carried**

13. **New Business. Chair Fields**

No new business.

14. **Adjournment. Chair Fields**

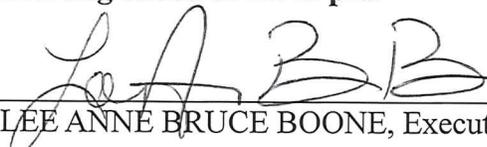
**Motion:** Commissioner Wilt moved to adjourn the meeting.

**Second:** Commissioner Weintraub

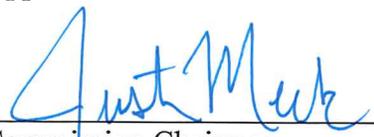
**Roll Call Vote:** Johnson – yes, Meek – yes, Weintraub – yes, Wilt – yes, Fields – yes

**Motion Carried.**

**Meeting ended at 12:45 pm.**

  
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LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

  
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Commission Chairman

Name Printed: JUSTIN MEEK