

OKLAHOMA ETHICS COMMISSION

November 13, 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, November 13, 2025, at 10:03 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 Joe Lucas [“Lucas”], Howard Johnson [“Johnson”], Mike Wilt [“Wilt”], 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, Compliance Officer Tyler Fixley, and Admin. Programs Manger Darci Ray.

Observing all or part of the meeting: Erik Parker, Media; Denise Lawson, Attorney; H.J. Reed, OKSPA; Jim Dunley, OKSPA; Dylan Brown, Media; Kevin Joseph, Media; Andrea Hancock, Media; Alex Gladden, Media; and Judd Strom, Chairman, General Government.

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.

Executive Director Bruce Boone announced that Darci Ray’s 10-year anniversary with the Ethics Commission was on September 22, 2025. Chair Meek presented Darci Ray with her decade-of-service certificate and pin.

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 October 6, 2025. [Chair Meek]**

Motion: Commissioner Wilt moved to approve the minutes for the special meeting and executive session held on October 6, 2025.

Second: Vice Chair Johnson

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

Motion Carried

6. **Hearing on Advisory Opinion Request No. 2025-03, request from Representative Judd Strom, pursuant to Okla. Const. art. XXIX, § 5, and Okla. Ethics Rule 1.7. Chair Meek**

Chair Meek opened the floor for public comment. Members of the public were permitted to present oral arguments, data, and views regarding the proposed advisory opinion.

Comment by General Counsel Kerr stated that the Commission had not received any written or verbal comments.

Comment by Representative Judd Strom, who explained that the issue arose because there is never an ideal time to close a depository account and establish a new one. He noted that this has been a recurring issue for multiple candidates and that it would be much easier to keep the account open as long as the individual is running for the same office.

Comment by Executive Director Bruce Boone that the Commission has established working groups with the House and the Senate and this advisory opinion is a byproduct of those meetings.

Comment by Chair Meek expressed his hope that the Commission continues to focus on education, cooperation, and compliance, and emphasized the Commission's open-door policy to ensure that all parties understand the rules.

Comment by General Counsel Kerr that the redlined sentence represented the only difference in the two drafts, in whether the Commission wanted the depository account to include the election year or not.

Question by Commissioner Wilt asked Representative Strom whether he had an opinion on the matter.

Comment by Representative Judd Strom stated that this is how some individuals have been operating and that he does not believe there would be any issue with candidates keeping the same account. He added that it is difficult to obtain records from as far back as 2018 for an account that is no longer open.

Question by Vice Chair Weintraub asked whether Representative Strom supported the year on the account or not.

Comment by Representative Judd Strom responded that including the year on the account is acceptable.

Comment by Executive Director Bruce Boone stated that the primary objective is to ensure transparency.

Motion: Vice Chair Weintraub moved that we adopt draft number one for Advisory Opinion 2025-03.

Second: Commissioner Wilt

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

7. Introduction and explanation of a rulemaking request submitted by Representative Meloyde Blancett regarding Independent Expenditures. Chair Meek to introduce Executive Director Bruce Boone.

Executive Director Boone stated that in the absence of Representative Meloyde Blancett, she wanted to outline concerns related to dark money and independent expenditures (IEs) and how they are being used to influence elections. She cited examples including judicial retention in a Supreme Court election, as well as a PAC that utilized a grandmother as the listed individual conducting the activity, despite the individual having no knowledge that the actions were taking place. She also referenced Proposition 211, noting that its provisions demonstrate how such practices can impact elections regardless of political affiliation.

Executive Director Boone explained that the matter under discussion is a proposed change to Rule 2.79, presented by General Counsel Kerr, as the current rule defines a PAC consisting of two or more persons, and an LLC as a single person. As a result, an LLC is not required to register as a PAC or disclose its donors under the current rule.

General Counsel Kerr explained that IEs can be challenging to research and to determine who is actually funding the IEs.

Comment by Executive Director Bruce Boone suggested that the Commission could also consider implementing limits on the amount of each contribution.

Motion: Vice Chair Weintraub moved to proceed with a partial rule change to amend the definition of a PAC from “two or more persons” to “one or more persons.”

Second: Commissioner Johnson

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

8. Introduction and explanation of a rulemaking request submitted by Lobbyist Association regarding changes to lobbyist rules including amending 5.14, 5.6, 5.16, 5.2 and deleting 5.8. Chair Meek to introduce Executive Director Bruce Boone.

Executive Director Boone explained that the discussion concerns whether the Commission would like to sponsor the following rules: 5.14, 5.6, 5.16, 5.2, and 5.8. She noted that contribution limits were updated last year, but one rule was inadvertently omitted due to staff being new to the rulemaking process at that time. She provided a description of each rule and outlined the specific changes the Commission is being asked to consider.

Question by Commissioner Wilt asked the representative of the organization submitting the rule proposal give some background on the rules.

Comment by H.J. Reed gave background on each rule. He stated he wanted clarity on some of the rules such as the food and beverage rule.

Comment by Executive Director Bruce Boone said that if the issue is clarity this may be better addressed by an advisory opinion.

Comment by H.J. Reed stated that the organization is about full transparency. He said he is open to clarity via an advisory opinion.

Motion: Vice Chair Weintraub moved to proceed with issuing an Advisory Opinion for Rule 5.14 regarding the definition of food and beverage.

Second: Commissioner Wilt

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

Motion: Vice Chair Weintraub moved to proceed with reviewing and considering proposed amendments and changes to Rules 5.16, 5.2, 5.6, and 5.8.

Second: Commissioner Wilt

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

9. Executive Director's Report

a. Budget and Legislative Update

Executive Director Bruce Boone reported that she presented at the interim study on Dark Money and noted that there may be forthcoming legislation on the subject. She stated that she was invited to attend the Senate Republican Caucus Retreat, where she provided training on campaign expenditures, Rules and Advisory Opinions, and the Guardian system. She also discussed legislation she is working

on with Senator Guthrie regarding FARA. Executive Director Bruce Boone reviewed the budget, noting that totals reflect a consistent spending pattern with no overages or negative balances and that there is a healthy reserve in Funds 195, 200, and 210. She noted that 2026 allocations for the 200 Funds are currently low due to system downtime but are expected to increase once Guardian 2.0 is operational. She provided an update on the operating budget, reporting stable cash flow and operating costs, with IT expenses being higher due to the implementation of Guardian 2.0; overall trends remain as expected.

Question by Commissioner Lucas asked for examples of what might be considered miscellaneous expenses.

Comment by Executive Director Bruce Boone noted that expenditures would include items such as office supplies or awards, citing Darci Ray's ten-year service certificate and pin as an example.

b. Guardian System Update

Executive Director Bruce Boone explained that the transition to the new Guardian 2.0 system was necessitated by the vendor, Civix, which no longer supported the old Guardian system. Although the previous system was functional, it could have benefited from upgrades. The transition occurred on a compressed timeline of six to eight months and was complicated by issues with data extraction, as three different formats were received. The most recent format proved easiest to work with, and progress would have been faster if all data had been in this format. On October 28, 2025, the system went live in Beta format, allowing users to register and access the system while ensuring data accuracy. Report submission deadlines were extended, with expectations to be ready by the end of November. Filers are able to enter contributions and expenditures but cannot submit reports until balances for some second-quarter reports are corrected. Once these corrections are made, filers will be allowed to submit their third-quarter reports.

Question by Commissioner Wilt regarding if you anticipate filings being allowed by the end of November?

Comment by Executive Director Bruce Boone stated that is the million dollar question. We anticipated it would be ready by now. Found it's not due to one simple factor so it is taking them a lot longer to fix the issues. It's due to multiple issues.

Comment by Deputy Director Rogers noted that addressing one issue in the system often impacts another function, describing the process as "taking two steps forward and one step back."

d. Advisory Groups

Executive Director Bruce Boone reported that the first meeting of the Advisory Group was held last week, noting that the group serves as a bridge between the Commission and the public. She emphasized that the Advisory Group has no formal authority but provides a vital opportunity for stakeholders affected by the reach of the Ethics Commission. Executive Director Boone stated that she reviewed the Strategic Plan and the proposed rules presented to the Commission with the group. She noted that the Advisory Group will meet quarterly and that additional specialized/working groups may be created as needed for larger projects when the Commission seeks further input.

Question by Commissioner Wilt can you go through the members?

Comment by Executive Director Boone explained that the group represents individuals and entities or at one point were regulated by the Commission. The members include Jari Askins, former judge and former representative; Michael McNutt, former journalist; Clayton Taylor, representing lobbyist organizations; Denise Lawson, an attorney who represents various regulated entities; Karma Robinson, who brings state-level experience with PACs and extensive FEC experience; Charles Ortega, legislative liaison for OMES and a former legislator; Jarred Brejcha, former OEC Chair with campaign management experience; and Drew Edmonds, a former officeholder. Executive Director Boone asked the members to serve on a voluntary basis for a two-year term.

e. Rulemaking Notice and Consideration

Executive Director Bruce Boone provided an update on the FARA rule that Representative Duel asked the Commission to sponsor. The proposed rule change or addition would require lobbyists to disclose whether they represent a foreign adversary. Representative Duel requested to withdraw the request, since significant efforts are already underway to address this issue.

Question by Commissioner Wilt asked whether Representative Duel had simply withdrawn the request.

Comment by General Counsel Kerr responded that Representative Duel chose to step back because other legislation addressing the issue is currently underway.

Executive Director Bruce Boone explained that the timeframe between this meeting and the December meeting is very short, and the Commission must provide at least a 30-day Notice of Hearing for rulemaking. The rules must be voted on by January, and the rules package must be submitted to the Legislature by February. She

outlined two options: holding a separate public meeting, which would require the attendance of at least two commissioners but no more than two, or scheduling a special meeting which would require the majority of the Commissioners to be present.

Question by Commissioner Lucas Commissioner Lucas asked whether the December 4 meeting could be moved to a later date in the month.

Comment by Executive Director Bruce Boone commented that staff could coordinate with the group to see if a suitable date could be identified.

10. 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-viii 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 Rule 2; State of Oklahoma ex rel. Oklahoma Ethics Commission v. Pittman, Oklahoma County District Court, Case No. CV-2025-2636.
- ii. Case No. 2025-13 alleging violations of Ethics Rule 2, Campaign Finance.
- iii. Case No. 2025-14 alleging violations of Ethics Rule 2, Campaign Finance.
- iv. Case No. 2025-15 alleging violations of Ethics Rule 4, Conflict of Interest.
- v. Case No. 2025-19 alleging violations of Ethics Rule 4, Conflict of Interest.
- vi. Case No. 2024-38 alleging violations of Ethics Rule 2, Campaign Finance.
- vii. Case No. 2024-32 alleging violations of Ethics Rule 4, Conflict of Interest.
- viii. Complaint Number(s):
C-25-21

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 10.

Second: Commissioner Wilt

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

Motion Carried to go into Executive/Close session at 11:37 am.

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

Motion: Commissioner Lucas moved to return to Open Session at **2:24 pm.**

Second: Commissioner Johnson

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

Motion Carried.

- 11.** 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 direct the Executive Director to submit the Settlement Offer discussed in Executive Session to the defendant in **Case No. 2022-25** and upon acceptance, execute the same.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Vice Chair Weintraub moved pursuant to direct the Executive Director to submit the Settlement Offer discussed in Executive Session to the defendant in **Case No. 2025-13** and upon acceptance, execute the same.

Second: Commissioner Johnson

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

Motion Carried.

Motion: Commissioner Wilt moved to accept the offer of settlement in **Case No. 2025-14** and authorize the Executive Director to execute the same.

Second: Commissioner Weintraub

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

Motion Carried.

Motion: Commissioner Wilt moved to accept the offer of settlement in **Case No. 2025-15** and authorize the Executive Director to execute the same.

Second: Commissioner Johnson

Director Bruce Boone discussed moving the final Commission meeting of next year to either December 3 or December 17, 2025, due to a conflict with the COGEL Conference.

Motion: Vice Chair Weintraub moved to approve date recommendations and to move the final Commission meeting of next year to December 3, 2026.

Second: Commissioner Wilt

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

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]

13. Adjournment. Chair Meek

Motion: Commissioner Weintraub moved to adjourn the meeting.

Second: Vice Chair Wilt

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

Motion Carried.

Meeting ended at 2:36 pm.

LeeAnne Bruce Boone

LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

Justin Meek
JUSTIN MEEK, Chair