



OKLAHOMA

Ethics Commission



Commission Meeting
June 12, 2025
10:00 AM
OK State Capitol, Rm. G-3



OKLAHOMA
Ethics Commission



Call to Order

Open Meeting Act Compliance

Introductions & Announcements

Chair Election.

Vice Chair Election.



OKLAHOMA
Ethics Commission



Announcements, consideration, discussion, and possible action on the disqualification or recusal of any Commissioner or Commissioners pursuant to Ethics Rule 1.6



Consideration, discussion, and possible action on minutes for the special meeting and executive session held May 1, 2025



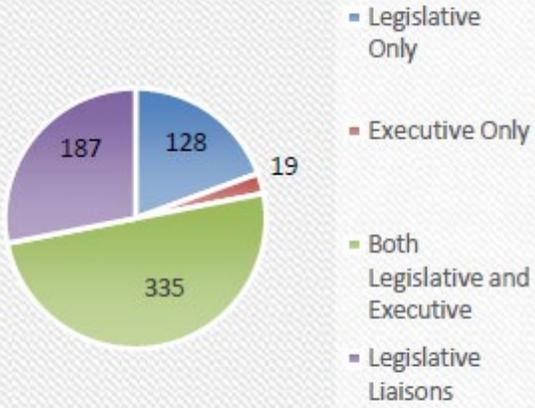
Executive Director's Report

Executive Director's Report

Compliance Update

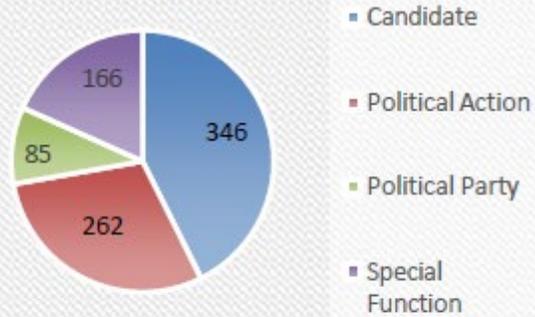
THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of June 1, 2025

Lobbyists



Total Lobbyists: 669

Committees



Total Committees: 859

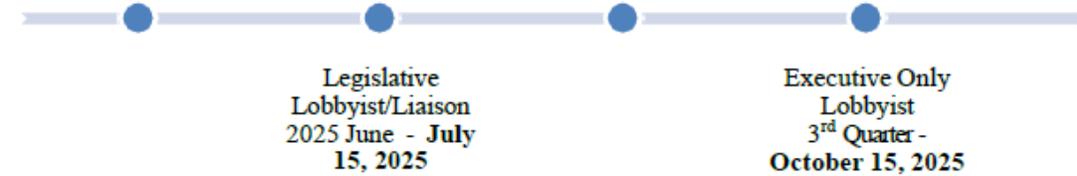
Total Lobbyists and Committees: 1,528

Upcoming Reporting Schedules

Lobbyist/Liaison

Legislative
Lobbyist/Liaison
2025 May- June
5, 2025

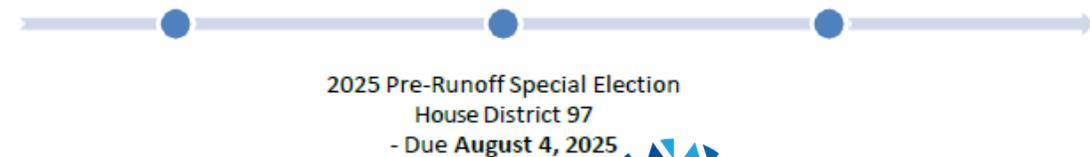
Executive Only
Lobbyist
2nd Quarter –
July 15, 2025



Candidates & Non-Candidate Committees

2025 2nd Quarter Due
July 31, 2025
(Candidates and non-
Candidate Committees)

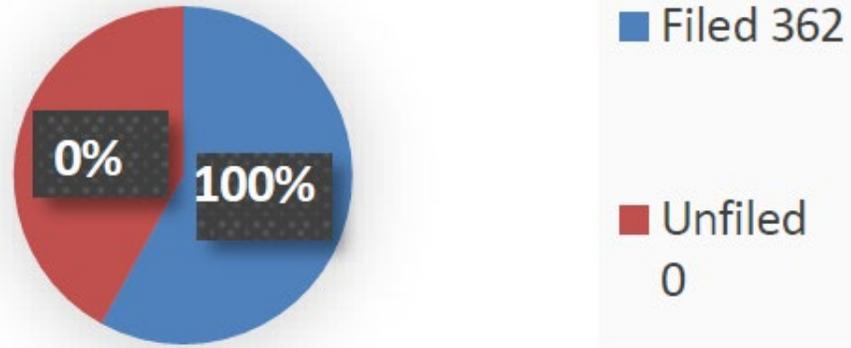
2025 Pre-General
Special Election House
District 97-- Due
September 1, 2025



OKLAHOMA
Ethics Commission

Compliance Update

PERSONAL FINANCIAL DISCLOSURE (PFD) COMPLIANCE



Calendar Year 2024 Annual Filing for Elected Officials & Governor Appointed Cabinet & Agency Directors was due between:

January 1, 2025 & May 15, 2025

COMPLIANCE ACTIVITY TRACKER			
DATE – MAY 2025			
	COMPLIANCE OFFICERS		
	CO#1	CO#2	CO#3
# CANDIDATES/OFFICES ASSIGNED	95	95	93
CALLS/WALK-INS	78	31	104
REPORTS REVIEWED	62	237	64
EMAIL CORRESPONDENCE	182	142	18
TOTALS	322	410	186

It was a pleasure meeting with you this morning. I hope our time together was valuable. I wanted to follow up regarding the topics we discussed this afternoon, particularly regarding campaign finance rules.

According to **Rule 2.21 (Contribution Deemed Accepted if Not Returned)**, a contribution will be considered accepted if it is not returned within ten (10) business days of receipt. You should record the contribution on the date it's deposited into the bank, and you have ten business days after receipt to make the deposit. Additionally, contributions cannot be received jointly from couples—they must be made individually.

Rule 2.22 (Deposit of Contributions) further specifies that contributions must be deposited into the campaign account within ten business days, or they must be returned to the contributor, and the return must be reported as an accepted and refunded contribution. You will also need to list the employer and occupation of each contributor.

Regarding Anadot contributions, please ensure that you list the deposit date when entering them into your records. For the event center donating space for your fundraiser, that will be recorded as an in-kind donation from the business.

Additionally, **Section 2.48 (Candidate Committee Surplus Funds)** outlines permissible uses for surplus campaign funds, including retaining them for future campaigns, donating them to charity, or contributing to other political committees. Surplus funds must be properly documented in your reports.

Rule 1.4 (Timely Filing) emphasizes that documents filed electronically with the Commission are timely as long as they are submitted on the specified day, even on weekends or holidays.

Lastly, **Rule 2.17 (General Rules for Contributions)** provides guidelines on required information for individual contributors, including name, address, employer, and occupation.

For your reference, here are some helpful links:

- [2026 State Elections Contribution Chart](#)
- [Excel File Template and Instructions](#)
- [Excel File Template](#)
- [Annotated Ethics Commission Rules](#)

I hope this recap is helpful, but please don't hesitate to reach out if you have any additional questions. I'm happy to assist!

Respectfully,

TRAVIS ROLLINS
Compliance Officer
Oklahoma Ethics Commission
2300 N. Lincoln Blvd., G-27
Oklahoma City, OK 73105
Main Line: (405) 521-3451
travis.rollins@ethics.ok.gov

 [Book time to meet with me](#)

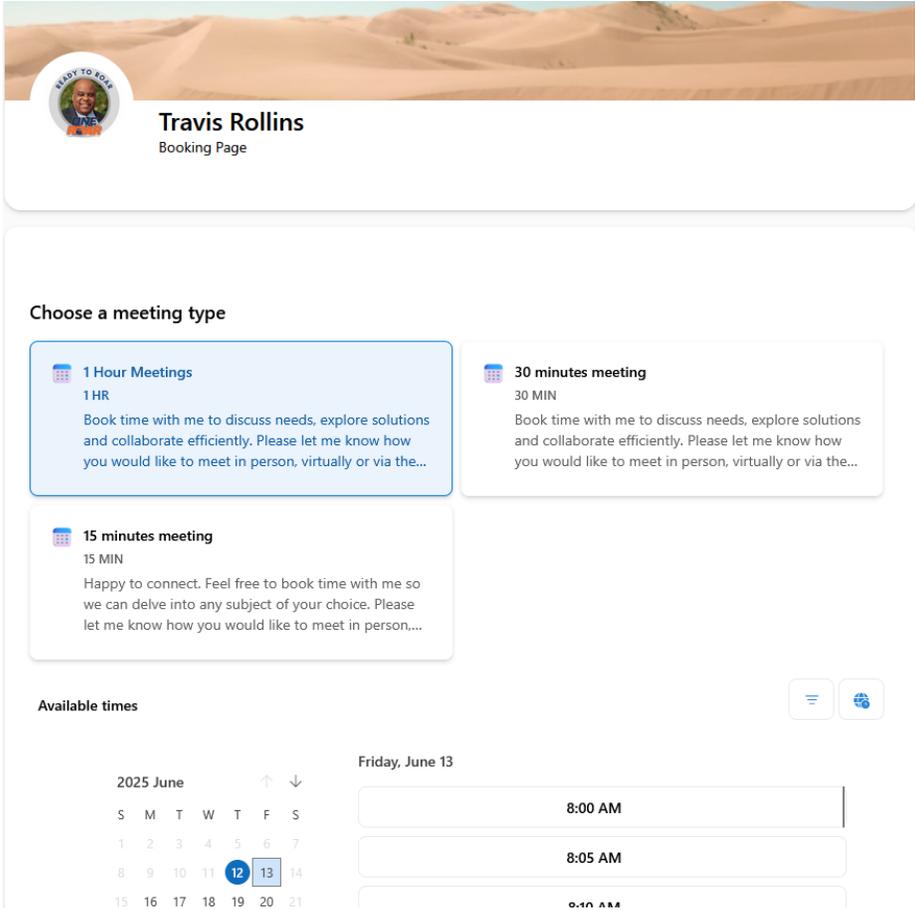


Education Efforts

[Book time to meet with me](#)



COMPLIANCE OFFICER



The screenshot shows a booking page for Travis Rollins. At the top, there is a header with a circular profile picture and the text "Travis Rollins Booking Page". Below this is a section titled "Choose a meeting type" with three options: "1 Hour Meetings" (1 HR), "30 minutes meeting" (30 MIN), and "15 minutes meeting" (15 MIN). Each option includes a brief description of the meeting. At the bottom, there is a calendar for June 2025 and a list of available times for Friday, June 13, including 8:00 AM, 8:05 AM, and 8:10 AM.

Legislative Update

Senate Bill 890

➤ **Centralizes campaign finance and financial disclosure filings for the Political Subdivisions under the Ethics Commission**

Effective November 1, 2025

➤ **APPLIES TO:** Candidate & Elected Officials of the Political Subdivisions (i.e., Counties, Municipalities, and Technology Centers & School Districts)

➤ **REPOSITORY OF FILINGS:** Filings currently maintained at that local level (i.e., County Election Board, City Clerk, & School Clerks) will transition to the Ethics Commission, specifically Guardian 2.0.

- Includes all financial disclosures and campaign reports

➤ **RETENTION OF RECORDS:** Records of filings also transition to the Ethics Commission with the requirements to maintain filings for at least 4 years and the ability to publicize copies of filings.



Legislative Update

Ethics Commission Rulemaking

Effective May 30, 2025

Summary of Changes in 2025

- Increase in the anonymous contribution amount from \$50 to \$200
- New definition for foreign national, including political caucus committee as a type of political party committee, and includes clarification for independent expenditure definition to conform with FEC definition
- Added language to require certification by treasurers and/or deputy treasurers regarding any funding received by foreign nationals
- Removed requirement of attendance at event by lobbyist, liaison, or lobbyist principal associated with a permissible gift per Ethics Rules 5.6.
- Increased aggregate meal and gift limits for lobbyist or Legislative Liaisons from \$500 to \$750 (gifts of infrequently occurring occasions to \$200).
- Modified blackout period to conclude after primary election if such election determines outcome.



Legislative Update

House Bill 2164

- **Public Corruption bill that includes a requirement for certain state executive officers to attend an educational course directed by the Ethics Commission**

Effective January 1, 2027

- **APPLIES TO:** each person elected or appointed for the first time as chief executive officer or head of a **state** agency, board, bureau, trust, commission, council, department, system, or authority
- **CURRICULUM FOR THE COURSE:** Shall include, but not be limited to, *conflicts of interest, impartiality, misuse of office, misuse of authority, and financial disclosures*
- **CERTIFICATE OF COMPLETION** shall be awarded to those persons who attend and successfully complete the course & a **LIST** of such persons shall be maintained by the Ethics Commission
- **TIMELINE REQUIREMENT:** Course must be completed **within one (1) year** after taking the oath of office
 - “Any person who fails to satisfy the education requirements of this section shall cease to hold office commencing at the next scheduled meeting of the *governing body* following the first-year anniversary of the person’s taking the oath of office.”



Budget



Subcommittee	Agency Request	House	Senate
General Government			
Ethics Comm'n			
. FY-2025 Appropriation	\$2,364,630	\$2,364,630	\$2,364,630
. Full Implementation of Software Solution	\$1,000,000	\$1,000,000	\$1,000,000
. Funding removal - Guardian System replacement	\$0	(\$1,200,000)	(\$1,200,000)
. Funding removal - Political Subdivisions	\$0	(\$150,000)	(\$150,000)
. Political Subdivision Enforcement	\$300,000	\$300,000	\$300,000
. FY-2026 Appropriation Requested	\$3,664,630	\$2,314,630	\$2,314,630

Budget Transparency Portal – House of Representatives

<https://former.okhouse.gov/fiscal/FiscalPortal.aspx>





Budget

As of May 31, 2025

<u>Business Unit</u>	<u>Class</u>	<u>Dept</u>	<u>Bud Ref</u>	<u>Allocations</u>	<u>Pre Encumbered</u>	<u>Encumbered</u>	<u>Current Yr Exp</u>	<u>Prior Yr Exp</u>	<u>Allotment Budget</u>	<u>Available Cash</u>
29600										
			191							150,000.00
	19102	10	25	75,000.00	.00	.00	.00	.00	75,000.00	
	19102	88	25	75,000.00	.00	.00	.00	.00	75,000.00	
				150,000.00					150,000.00	
			195							44,371.25
	19501	10	25	1,014,630.00	.00	5,475.04	885,711.75	.00	123,443.21	
				1,014,630.00		5,475.04	885,711.75		123,443.21	
			200							683,740.36
	20000	10	23	358,488.00	.00	100,377.22	.00	76,842.15	181,268.63	
	20000	10	24	178,006.00	.00	41,501.74	(9,217.28)	48,672.03	97,049.51	
	20000	10	25	115,238.00	.00	19,201.58	43,596.45	.00	52,439.97	
				651,732.00		161,080.54	34,379.17	125,514.18	330,758.11	
			211							373,814.50
	21100	88	23	190,580.00	.00	7,745.02	.00	171,735.42	11,099.56	
	21100	88	24	164,186.00	.00	3,995.66	(76,926.61)	153,056.17	84,060.78	
	21100	88	25	231,540.00	.00	8,696.18	128,925.10	.00	93,918.72	
				586,306.00		20,436.86	51,998.49	324,791.59	189,079.06	
			212							884,930.00
	21200	88	25	1,200,000.00	.00	539,986.00	315,070.00	.00	344,944.00	
				1,200,000.00		539,986.00	315,070.00		344,944.00	
Business Unit Totals				4,978,582.00	.00	726,978.44	1,401,132.95	1,712,246.23	1,138,224.38	2,136,856.11
<u>Business Unit</u>	<u>Class</u>	<u>Dept</u>	<u>Bud Ref</u>	<u>Allocations</u>	<u>Pre Encumbered</u>	<u>Encumbered</u>	<u>Current Yr Exp</u>	<u>Prior Yr Exp</u>	<u>Allotment Budget</u>	<u>Available Cash</u>
Grand Totals				4,978,582.00	-	726,978.44	1,401,132.95	1,712,246.23	1,138,224.38	2,136,856.11

Budget

Actuals as of May 31, 2025 Admin General Operations

Department: 1000010 Admin General Operations

Account	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511 Salary Expense	682,944	626,032	634,679.15	0.00	0.00	634,679.15	48,264.85	-8,647.26	92.93	101.38
512 Insur.Prem-Hlth-Life,etc	153,996	141,163	70,640.12	1,172.62	0.00	71,812.74	82,183.26	69,350.26	46.63	50.87
513 FICA-Retirement Contributi	170,808	156,574	145,756.72	0.00	0.00	145,756.72	25,051.28	10,816.84	85.33	93.09
515 Professional Services	122,596	112,380	21,776.45	4,732.00	0.00	26,508.45	96,087.55	85,871.07	21.62	23.59
519 Inter/Intra Agy Pmt-Pers S	432	396	1,327.37	166.83	0.00	1,494.20	-1,062.20	-1,098.20	345.88	377.32
521 Travel - Reimbursements	32,904	30,161	10,421.83	0.00	0.00	10,421.83	22,482.17	19,739.62	31.67	34.55
522 Travel - Agency Direct Pmt	3,600	3,300	4,390.29	0.00	0.00	4,390.29	-790.29	-1,090.40	121.95	133.04
531 Misc. Administrative Expen	15,634	14,331	15,951.97	6,881.48	0.00	22,833.45	-7,199.45	-8,502.65	146.05	159.33
532 Rent Expense	1,839	1,686	2,640.63	662.61	0.00	3,303.24	-1,464.24	-1,617.60	179.62	195.96
533 Maintenance & Repair Expen	9,617	8,816	13,649.44	5,205.06	0.00	18,854.50	-9,237.50	-10,038.99	196.05	213.88
536 General Operating Expenses	9,412	8,627	6,984.02	0.00	0.00	6,984.02	2,427.98	1,643.39	74.20	80.95
541 Office Furniture & Equipme	1,086	996	1,086.00	0.00	0.00	1,086.00	0.00	-90.50	100.00	109.09
552 Scholar.,Tuition,Incentive	0	0	4.21	0.00	0.00	4.21	-4.21	-4.21	~	~
601 AFP Encumbrances	0	0	0.00	5,856.02	0.00	5,856.02	-5,856.02	-5,856.02	~	~
810 Req Only	0	0	0.00	164,299.80	0.00	164,299.80	-164,299.80	-164,299.80	~	~
	1,204,868	1,104,460	929,308.20	188,976.42	0.00	1,118,284.62	86,583.38	-13,824.45	92.81	101.25
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19102 GRF-Duties	75,000	68,750	0.00	0.00	0.00	0.00	75,000.00	68,749.56	0.00	0.00
19501 GRF-Duties	1,014,630	930,077	885,711.75	167,774.84	0.00	1,053,486.59	-38,856.59	-123,409.86	103.83	113.27
20000 Ok Coun Campaign, Eth Rev	115,238	105,634	43,596.45	21,201.58	0.00	64,798.03	50,439.97	40,835.85	56.23	61.34
	1,204,868	1,104,460	929,308.20	188,976.42	0.00	1,118,284.62	86,583.38	-13,824.45	92.81	101.25
Totals for Division 10	1,204,868	1,104,460	929,308.20	188,976.42	0.00	1,118,284.62	86,583.38	-13,824.45	92.81	101.25

Budget to Actuals as of May 31, 2025

Admin IS Services

Department: 8800020 Administrative IS Services

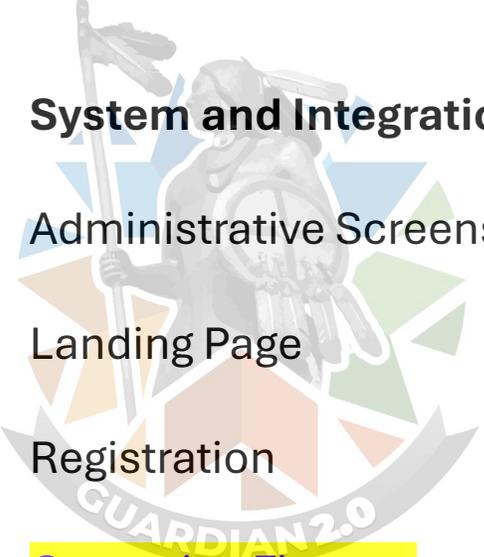
Account	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511 Salary Expense	70,850	64,946	0.00	0.00	0.00	0.00	70,850.00	64,945.76	0.00	0.00
512 Insur.Prem-Hlth-Life,etc	9,078	8,322	0.00	0.00	0.00	0.00	9,078.00	8,321.50	0.00	0.00
513 FICA-Retirement Contributi	17,825	16,339	0.00	0.00	0.00	0.00	17,825.00	16,339.40	0.00	0.00
515 Professional Services	1,290,462	1,182,924	351,444.40	542,562.88	0.00	894,007.28	396,454.72	288,916.22	69.28	75.58
531 Misc. Administrative Expen	15,441	14,154	6,436.62	870.80	0.00	7,307.42	8,133.58	6,846.83	47.32	51.63
532 Rent Expense	1,524	1,397	1,182.34	566.85	0.00	1,749.19	-225.19	-352.19	114.78	125.21
533 Maintenance & Repair Expen	78,760	72,197	70,771.00	3,050.00	0.00	73,821.00	4,939.00	-1,624.37	93.73	102.25
536 General Operating Expenses	600	550	2,760.74	455.92	0.00	3,216.66	-2,616.66	-2,666.66	536.11	584.85
541 Office Furniture & Equipme	22,000	20,167	11,400.00	0.00	0.00	11,400.00	10,600.00	8,766.63	51.82	56.53
601 AFP Encumbrances	0	0	0.00	1,175.73	0.00	1,175.73	-1,175.73	-1,175.73	~	~
810 Req Only	0	0	0.00	7,000.00	2,600,000.00	2,607,000.00	-2,607,000.00	-2,607,000.00	~	~
	1,506,540	1,380,995	443,995.10	555,682.18	2,600,000.00	3,599,677.28	-2,093,137.28	-2,218,682.61	238.94	260.66
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19102 GRF-Duties	75,000	68,750	0.00	0.00	0.00	0.00	75,000.00	68,750.00	0.00	0.00
20000 Ok Coun Campaign, Eth Rev	0	0	0.00	0.00	2,600,000.00	2,600,000.00	-2,600,000.00	-2,600,000.00	~	~
21100 Ethics Comm Online Filing	231,540	212,245	128,925.10	15,696.18	0.00	144,621.28	86,918.72	67,623.39	62.46	68.14
21200 Ethics Com Fil Sys Replcmn	1,200,000	1,100,000	315,070.00	539,986.00	0.00	855,056.00	344,944.00	244,944.00	71.25	77.73
	1,506,540	1,380,995	443,995.10	555,682.18	2,600,000.00	3,599,677.28	-2,093,137.28	-2,218,682.61	238.94	260.66
Totals for Division 88	1,506,540	1,380,995	443,995.10	555,682.18	2,600,000.00	3,599,677.28	-2,093,137.28	-2,218,682.61	238.94	260.66
Totals for Bus Unit 29600	2,711,408	2,485,455	1,373,303.30	744,658.60	2,600,000.00	4,717,961.90	-2,006,553.90	-2,232,507.06	174.00	189.82





➤ **GO-LIVE: July 1**

- Current Guardian System Public Shut-Off: **June 27th@5PM**
- RFD On-Site for first few weeks of *Go-Live*
 - **Training:** In-Person & Virtual; Training Material In Development
- User Acceptance Testing (**UAT**) with Staff
 - Login/Registrations/Filings/Calendar Set-up/Uploads
 - Anticipate testing from current users in coming week(s)
- **RISKS**
 - Data Conversion: Development at last minute
 - Data Analytics for Public Facing Reports
- **CONTINGENCY PLANS**
 - **PHASE 1 & PHASE 2:** Hierarchy of Objectives Are Clear
 - Pivots & Communication

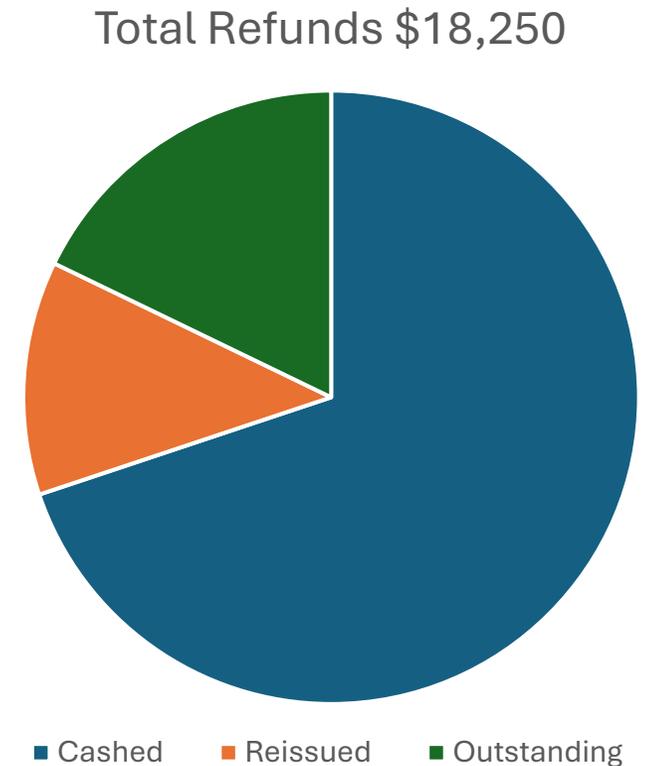


System and Integration Test	43%	4/14/2025 - 6/16/2025
Administrative Screens	0%	4/14/2025 - 6/16/2025
Landing Page	95%	5/5/2025 - 5/19/2025
Registration	85%	4/14/2025 - 05/26/2025
Campaign Finance	85%	4/14/2025 - 6/16/2025
Lobby	60%	4/14/2025 - 6/16/2025
PFD	10%	4/14/2025 - 6/16/2025
PDFs	20%	4/14/2025 - 6/16/2025
Adobe Sign	70%	4/14/2025 - 6/16/2025
Payment Processing	45%	4/14/2025 - 6/16/2025
Power BI	0%	4/14/2025 - 6/16/2025
System Test Complete	0%	6/16/2025

User Acceptance Test	5%	6/16/2025 - 6/30/2025
Administrative Screens	10%	6/16/2025 - 6/30/2025
Landing Page	20%	6/16/2025 - 6/30/2025
Registration	25%	6/16/2025 - 6/30/2025
Campaign Finance	0%	6/16/2025 - 6/30/2025
Lobby	0%	6/16/2025 - 6/30/2025
PFD	0%	6/16/2025 - 6/30/2025
PDFs	0%	6/16/2025 - 6/30/2025
Adobe Sign	0%	6/16/2025 - 6/30/2025
Payment Processing	0%	6/16/2025 - 6/30/2025
Power BI	0%	6/16/2025 - 6/30/2025
User Acceptance Test Complete	0%	6/30/2025

Lobbyist Refund

- We originally issued 730 refund checks = **\$18,250** total
- There were 220 checks uncashed at the check expiration of 3 months - **\$5,500** total not yet claimed
- Staff made and documented multiple contact attempts regarding uncashed checks by phone and email
- Of those 220, 90 checks will be reissued - **\$2,250** total (could go higher).
- The remainder, if not requested as a reissue, will go through warrant process with the State of OK as unclaimed property.





OKLAHOMA
Ethics Commission

Livestreaming



Policy Considerations and Agency Recommendations

- Consideration, discussion, and possible action on LOFT's recommendation to make certain administrative documents available on ethics.ok.gov



Staff Memo 2025-01, Affirmative Duty to Dissolve Candidate Committee.

A candidate who creates a candidate committee while a previous candidate committee is still active has an affirmative duty to dissolve the first candidate committee within sixty days of creating the second candidate committee.

The spirit of Rule 2.69 is to ensure that those donating to a candidate committee are donating to the current, active committee. The rule prohibits having more than one candidate committee open at a time, except that for *no more than* 60 days, a candidate can have two committees open, giving the candidate time to dissolve the first committee.

Rule 2.2 defines a candidate committee as the “only” committee authorized by a candidate to accept contributions or make expenditures on behalf of the candidate. Using this definition in Rule 2.2 combined with Rule 2.69, we find that there is an affirmative duty for candidates to dissolve a first candidate committee within 60 days of creating a new candidate committee.

Candidates have an affirmative duty to dissolve their candidate committee within sixty days of creating a second candidate committee.

Staff Memo 2025-02, acceptance of Digital Currency as a contribution

Can Committees accept digital currency as an in-kind contribution, subject to the same restrictions, limitations, and reporting requirements as any other contribution?

Ethics Commission Rule 2.2(6) defines a contribution as “any gift, subscription, loan, guarantee or forgiveness of a loan, conveyance, advance, payment, distribution or deposit of money made to, or **anything of value** given to, or an expenditure other than an independent expenditure made on behalf of, a political party, political action committee or candidate committee, but shall not include the value of services provided without compensation by an individual who volunteers those services;” Emphasis added.

The Commission Comment to Rule 2.2 provides in part, “the definition of ‘contribution’ is intended to be all-inclusive except for independent expenditures, volunteer services, and other items specifically excluded by these Rules.” Digital currency is a thing of value, and is not excluded by the Ethics rules.

Digital currency meets the definition of a contribution since it is a thing of value and is not specifically excluded by the Rules.



Advisory Opinion Request: AOR 2025-01 Regarding Acceptance of Digital Currency

➤ Questions for Advisory Opinion

- 1) May Oklahoma committees accept cryptocurrency contributions combined with real-time, biometric-enabled KYC that effectively prevents anonymous or foreign contributions?
- 2) Is the FEC's in-kind USD valuation model acceptable in Oklahoma, and may such assets be held in a separate, sec-controlled digital wallet pending conversion, disbursement, or refund?
- 3) May committees use cryptocurrency for vendor payments, applying the same USD valuation and reporting standards?
- 4) May Oklahoma adopt a Data Vault-style NFT fundraising program under a framework akin to FEC AO 2022-22?

Submitted by: Tabularius Group LLC, a provider of fintech, compliance, and campaign finance advisory services to political committees





OKLAHOMA

Ethics Commission



Commission Meeting
June 12, 2025
OK State Capitol, Rm. G-3



Executive Session

Case No. 2024-11 alleging violations of Ethics Rule 4, Conflicts of Interest.

Case No. 2024-14 alleging violations of Ethics Rule 2, Campaign Finance.

Case No. 2022-12 alleging violations of Ethics Rule 2, Campaign Finance.

Case No. 2022-25 alleging violations of Ethics Rule 2, Campaign Finance.

Complaint C-24-40

Complaint C-25-10

Complaint C-25-08

Complaint C-25-11



OKLAHOMA
Ethics Commission



New Business



Adjournment



OKLAHOMA

Ethics Commission



Next Regularly Scheduled
Commission Meeting
July 10, 2025, @10:00 a.m.
OK State Capitol, Rm. G-3