

# OKLAHOMA ETHICS COMMISSION

March 12, 2026  
Regular Meeting

## 1. Call to Order.

Vice Chair Weintraub [“Weintraub”] called to order the meeting of the Ethics Commission of the State of Oklahoma [“Commission”] on Thursday, March 12, 2026, at 10:00 am. in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma, after confirming the agenda and notice were properly 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”], and Vice Chair Adam Weintraub [“Weintraub”]. 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 Assistant Compliance Officer Aniston Emory.

**Observing all or part of the meeting:** Joseph Pierce, Senate; H.J Reed, OKSPA; and Katrina Crumbacher, Media.

## 2. Open Meeting Act Compliance.

Vice Chair Weintraub 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 Commissioner(s) 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 February 12, 2026. [Vice Chair Weintraub]

**Motion:** Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on February 12, 2026.

**Second:** Commissioner Lucas

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

**Motion Carried**

6. **Executive Director’s Report**

**a. Budget Update**

Executive Director Bruce Boone noted that the Commission is in a stable financial position and is operating within its approved budget. Expenditures are tracking appropriately for this fiscal year. She also mentioned that the Commission is maintaining a healthy cash balance, and overall financial activity is aligned with the Commission’s budget and operational priorities.

**b. Legislative Update**

Executive Director Bruce Boone mentioned two bills that the Commission has been tracking and monitoring.

Senate Bill 2180, authored by Senator Daniels, may impact state agencies as a whole and the overall budget process. SB 2180 addresses foreign agent political activity and has moved out of committee. The bill would require the Secretary of State to track and register foreign agents. A similar bill was passed last year. We have a rule proposal that would require lobbyists to disclose when there is involvement with a country of particular concern, but we aren’t currently maintaining one. Executive Director Bruce Boone noted that she has been working closely with Senator Daniels on this bill.

House Bill 3306, authored by Representative Steagall, would lower the baseline amount that triggers a candidate committee to register with the Commission. The bill initially proposed a \$0.00 threshold for all candidates; however, the committee chair requested that the amount be increased to \$400.00. This requirement would apply to all committees, whether at the state level or the political subdivision level. Executive Director Boone asked that the timing of the implementation of the bill’s implementation be considered, as the effective date could impact individuals who are currently in an election cycle. House Bill 3306 has passed the House and is currently out of committee but has not yet been heard on the House floor.

Question by Commissioner Wilt asked whether House Bill 3306 would apply to political subdivisions.

Comment by Executive Director Bruce Boone confirmed that it would. She explained that candidates running in statewide races are likely to accept or spend at least \$1,000. Therefore, she believes the bill would have a greater impact on local races than on statewide races.

Question by Vice Chair Weintraub asked whether there is any legislation addressing dark money, given the significant amount of input the Commission has received on the issue.

Comment by Executive Director Bruce Boone explained that there is currently no legislation on the matter. She noted that Representative Blancett had spoken with the Commission Advisory Group, and the plan is to return next year with a potential rules package or proposed rule.

Question by Vice Chair Weintraub asked whether that is the only direction the Legislature is taking and if no one is acting independently.

Comment by Executive Director Bruce Boone stated that several bills had been filed, but none have gained traction.

Comment by Commissioner Wilt noted that only about one-third of the bills filed are still alive.

**c. Compliance Update**

Executive Director Bruce Boone highlighted that the Compliance Officers were able to review all 3rd and 4th Quarter reports and send out review letters, completing these tasks during the month of February. She noted that, in addition to reviewing reports, the Compliance Officers also handle phone calls and walk-in inquiries.

Executive Director Boone also mentioned that a state agency recently contacted the Commission to request lobbyist training. Denise Klein, Director of Compliance, and James Mahan, Compliance Officer, went on-site to conduct the training. The session included one-on-one training on the Guardian system with eight agents, an overview of campaign finance reporting calendars and requirements, and guidance on how to report their activities. The Commission received very positive feedback on the training. She added that the Commission offers training to state agencies upon request.

**d. Guardian Update**

Executive Director Bruce Boone reported that operations with the Guardian system are running smoothly and that the Commission's partnership with Civix continues to be strong. She provided an update on the local subdivision project with Civix: Phase 1 will be visible to filers, while Phase 2 will focus on the administrative side. She noted that the project is on schedule and progressing in an organized manner.

Executive Director Boone also stated that, with the assistance of OMES, the Commission was able to locate a vendor who quickly provided a solution for the interim system. Within days, the Commission completed internal and external testing and made the system available to the public. The main challenge remains ensuring that people are aware of the interim system.

To address this, the Commission has used multiple methods to reach filers, including local media, social media, email, and collaboration with trusted partners such as the Municipal League, COG, OSSBA, and other organizations that work closely with local officials. She noted that some local filers still need education on filing requirements, with some not previously filing at the local level, highlighting the significant educational aspect of this effort.

Feedback on the interim system has been very positive, with local filers reporting that it is easy to use, straightforward, and helpful in catching reporting errors. The total cost for the interim system was \$1,000, and it requires minimal staff commitment. Compliance Officers can quickly review submissions to ensure they are actual campaign finance documents or personal financial disclosures rather than spam.

Question by Commissioner Johnson who is the vendor?

Comment by Executive Director Bruce Boone stated their name is Concourse. They have done a project for OMES in the past on the site for procurement with state contracts and they were able to do some analytics for them. They came highly recommended.

Executive Director Bruce Boone noted that lots of people approached with different systems, but their prices points were a lot more expensive, and this was just much more cost-effective and also required little handling for the Commission staff.

**e. LOFT Update**

Executive Director Bruce Boone noted that it has been one year since the Legislative Office of Fiscal Transparency (LOFT) review. The Commission received a letter requesting an impact statement, which will be posted to LOFT's

website. LOFT also requested feedback on all of the recommendations it previously submitted to the Commission.

The improvements recommended in the review focused on oversight, transparency, operational efficiency, and proactive compliance. Executive Director Boone explained that the LOFT review occurred during a period when the Commission was being reshaped. As a result, many of the recommendations in the report aligned with initiatives the Commission had already begun pursuing as part of its strategic planning.

The follow-up report highlighted several implemented improvements, including the implementation of a case management system, enhanced campaign finance oversight, a risk-based assessment program, the publication of an annual report, and increased procedural transparency. All recommendations have been implemented with the exception of delaying investigations during the legislative session. After conducting research and determining that no other states pause investigations during legislative sessions, the Commission decided not to implement that recommendation.

Comment by Vice Chair Weintraub thanked and applauded Executive Director Bruce Boone and staff for the difficulties that they have overcome by getting the filing and the reporting back to where it could be. He stated that he knows they will continue to do a great job.

7. Proposed Executive Session. Consideration, discussion, and possible action to enter Executive Session, as authorized by 25 O.S. 2021, § 307 (B)(4) and (7), and 2005 OK AG 29, ¶12, regarding the numbered matters set forth below, for the purpose of having confidential communications between the Commission and its counsel, regarding pending investigations, claims, or actions; and to discuss matters for which disclosure would seriously impair the ability of the Commission to proceed in the public's interest and would violate confidentiality under Ethics Rules 6.5 and 6.9. Vice Chair Weintraub
  - i. Case No. CJ-2026-558, State of Oklahoma ex rel. Oklahoma Ethics Commission v. RFD & Associates, Inc., Oklahoma County District Court.
  - ii. Case No. 2024-29, alleging violations of Campaign Finance Rule 2.
  - iii. Case No. 2024-32, alleging violations of Conflicts of Interest Rule 4.
  - iv. Complaints:  
C-26-04

**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 consider or process claims or conduct pending investigation(s), litigation, or proceeding in the public interest or violate confidentially

requirements under Oklahoma law and the Ethics Rules 6.5 and 6.9.

i. **Action to enter Executive Session.**

**Motion:** Commissioner Wilt 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:** Commissioner Johnson

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

**Motion Carried to enter Executive Session at 10:26 am.**

ii. **Action to exit Executive Session:**

**Motion:** Commissioner Wilt moved to return to Open Session at **11: 26 a.m.**

**Second:** Commissioner Johnson

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

**Motion Carried.**

Possible action on the above matters discussed in Exec. Session. Vice Chair Weintraub

**Statement by General Counsel Kerr:** General Counsel Kerr stated that the Commission had one recusal on one case. She asked if there were any additional recusals on anything discussed in Executive Session or any Motions to recuse, and there were none.

**Motion:** Commissioner Wilt moved to authorize the Attorney General’s office to proceed in **Case No. CJ-2026-558** as discussed in executive session.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Motion:** Commissioner Wilt moved pursuant to make an offer of Settlement to the Respondent in **Case 2024-29**, pursuant to Ethics Rule 6.10, as discussed in Executive Session.

**Second:** Commissioner Lucas

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

**Motion Carried.**

**Motion:** Commissioner Wilt moved to accept the offer of Settlement from the Respondent in Case 2026-03 as discussed in Executive Session; and issue the public statement as discussed in Executive Session, pursuant to Rule 6.9, for the reason that it is in the public interest and provides an educational benefit.

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Statement by Vice Chair Weintraub:** Vice Chair Weintraub stated the Commission will not be taking any action today on the following complaint discussed in Executive Session: C-26-04.

**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. Vice Chair Weintraub

**8. Adjournment. Vice Chair Weintraub**

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

**Second:** Commissioner Johnson

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

**Motion Carried.**

**Meeting ended at 11:34 a.m.**

  
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LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

  
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Chair Meek