



Oklahoma State Legislature

Director Lee Anne Bruce Boone,

As I am sure you are aware, there has been a lot of attention nationally regarding the issue of safety and security for state elected officials. The tragic assassination of state representative Melissa Hortman by shooting at her home in Brooklyn Park, Minnesota last month has emphasized to me the need to evaluate what can be done to prevent such an awful event from occurring in Oklahoma.

I am exploring how we can find a way to help provide security measures in our members' residences. I know this can be costly. I am also aware that not everyone has the personal resources to install these kind of measures.

The FEC has recently codified some of their previous guidance on the matter in Final Rule – 11 CFR 113.1(g)(10) (Effective Jan 1, 2025)

Candidate and federal officeholder security. The use of campaign funds to pay for the reasonable costs of security measures for a federal candidate, federal officeholder, member of their family, and employees—as defined in [26 CFR 31.3401\(c\)-1](#)—of the candidate's campaign or the federal officeholder's office, is not personal use, so long as the security measures address ongoing dangers or threats that would not exist irrespective of the individual's status or duties as a federal candidate or federal officeholder. Disbursements for security measures must be for the usual and normal charge for such goods or services. Usual and normal charge means, in the case of goods, the price of those goods in the market in which they are ordinarily purchased, and, in the case of services, the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered. Examples of such security measures include, but are not limited to:

- (i) Non-structural security devices, such as security hardware, locks, alarm systems, motion detectors, and security camera systems;
- (ii) Structural security devices, such as wiring, lighting, gates, doors, and fencing, so long as such devices are intended solely to provide security and not to improve the property or increase its value;

- (iii) Security personnel and services that are bona fide, legitimate, and professional; and
- (iv) Cybersecurity software, devices, and services.

I am writing to ask you to interpret whether the Oklahoma Ethics rules (updated June 1, 2025) would allow for the same or a similar result.

Specifically, would Rule 2.2 (15) and Rule 2.44 which address “Officeholder expenses” include these type of expenditures.

The FEC rule does not require a personal reimbursement for such an expenditure. Do the Oklahoma Ethics Rules allow for a similar exemption.

Thank you for your assistance in this matter.

Sincerely,



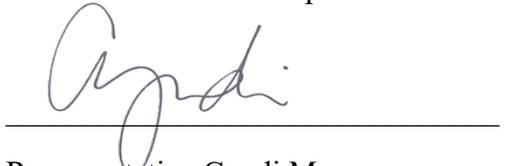
Senator Lonnie Paxton
President Pro Tempore
Oklahoma Senate



Senator Julia Kirt
Minority Leader
Oklahoma Senate



Representative Kyle Hilbert
Speaker of the House
Oklahoma House of Representatives



Representative Cyndi Munson
Minority Leader
Oklahoma House of Representatives