



December 18, 2024

Ryan M. Walters, as Chair and as Treasurer of Walters for State Superintendent 2022
c/o Trevor J. Paul and Tim Davis
777 Main Street, Suite 2100
Fort Worth, TX 76102
Via Email [REDACTED]

David Gleason
Via Email [REDACTED]

RE: Case No. 2024-03, In the matter of Ryan Walters as Chair and as Treasurer of Walters for State Superintendent 2022, alleging violations of Campaign Finance Rules

Dear Trevor J. Paul, Tim Davis and David Gleason:

Thank you for your letter dated December 2, 2024. In response to that letter, I offer the following information.

I. March 2024 Settlement Agreement

The March 6, 2024, Settlement Agreement (“Settlement”) involved 12 different Proposed Compliance Orders issued to Ryan Matthew Walters. A Proposed Compliance Order (“PCO”) is issued when a report is filed late or is not filed at all, resulting in the assessment of a late filing fee. In Mr. Walters’ case, the 12 PCOs issued related to reports that were due from June 16, 2022, through November 2, 2022. A total of \$6,600 in fines were assessed, and Mr. Walters and the Ethics Commission settled the outstanding fines for total payment of \$3,000. See Attachment A.

You will notice in the Settlement the following verbiage:

“In settlement of the compliance orders, as referenced herein, Walters, Committee, and the Commission (collectedly, “Parties”) agree as follows:” (Emphasis added)

The Settlement therefore resolved the compliance orders which were referenced within the Settlement. The next step is to review the compliance orders referenced within the Settlement. Paragraph 1 of the Settlement states:

*“The **following Proposed Compliance Orders** were issued by the Oklahoma Ethics Commission (“Commission”) to RYAN WALTERS (“Walters”) for WALTERS FOR STATE SUPERINTENDENT 2022 (#10425”) (hereinafter referred to as “Committee”).” (Emphasis added)*

Therefore, the 12 PCOs listed on pages 1 and 2 of the Settlement, are the subject of the Settlement. Those 12 Orders are referenced in the Settlement Agreement, each by description, date due, date filed, type of compliance order, and compliance fee amount. I am attaching as Attachment B, the 12 Proposed Compliance Orders, each of which have been resolved by the Settlement.

The Subpoena dated October 14, 2024, and issued to Ryan Walters in Case No. 2024-03 does relate to Campaign Finance Rules as pointed out in the subpoena and in your letter. However, Case No. 2024-03 is a pending case before the Oklahoma Ethics Commission and is not related to the Proposed Compliance Orders and assessed late fines which were resolved by the March 6, 2024, Settlement Agreement.

You letter states that the subpoena fails to reference the specific Rules alleged to have been violated or explain how the investigation differs from the “*investigation concerning alleged contribution violations*” of the Ethics Campaign Finance Rules settled on March 6, 2024.” As stated above, and as stated in the Settlement document itself, the Settlement only resolves the **late fines** assessed against Walters, which were the subject of the 12 PCOs. The PCOs did not ever involve an “investigation concerning alleged contribution violations;” instead the PCOs involved assessments of late fines.

Case No. 2024-03 relates to alleged violations of Rule 2, Campaign Finance, which Rules 2.1 through 2.122 encompass more than just due dates for the filing of reports. Those Rules are available on our website, ethics.ok.gov.

II. Subpoena’s Document Request

Your letter states that the document request in the subpoena is impermissibly overbroad, burdensome, and vague. The documents requested in the subpoena are the financial records of the Committee. Rule 2.73 provides:

The Treasurer shall be responsible for keeping the candidate committee’s financial records and accounts, including but not limited to all contributions accepted; all deposit slips or other evidence of acceptance of contributions; all expenditures made; all receipts, canceled checks or other evidence of payment of expenditures and all other documents necessary to file Reports of Contributions and Expenditures. All such documents shall be maintained for at least four (4) years and shall be made available to the Commission upon request of the Commission. The Treasurer shall be responsible for timely and accurately filing all Reports of Contributions and Expenditures for the committee.

Mr. Walters, as Treasurer of the Walters for State Superintendent 2022 Committee, is obligated to maintain all financial records, and further, to tender those records to the Commission upon request. In fact, much of what is requested in Numbers 5, 6 and 7 of the subpoena is information that should have already been provided in the Contribution and Expenditure Reports. For example, Rules 2.17 and 2.106 require candidates to include the occupation and employer information of any individual that contributes to a campaign.

III. Non-Existence of Responsive Documents.

In your letter, you state that Mr. Walters does not possess or control the documents requested in the subpoena. The subpoena requests all the financial records of the Committee, such as statements, invoices, receipts, etc. As the Treasurer, it is Mr. Walters' responsibility to maintain all financial records, and to make those records available to the Commission upon request, pursuant to Rule 2.73. If he does not possess or control the documents requested, then he has failed to comply with Rule 2.73. Please confirm whether Mr. Walters has complied with Rule 2.73.

Respectfully,

/s/ Margaret C. Kerr

Margaret C. Kerr, OBA #20515
General Counsel,
Oklahoma Ethics Commission
2300 N. Lincoln Blvd, Room G-27
Oklahoma City, OK 73105
margaret.kerr@ethics.ok.gov
Phone: (405) 522-2517



OKLAHOMA ETHICS COMMISSION

March 6, 2024

Via email

RYAN MATTHEW WALTERS
WALTERS FOR STATE SUPERINTENDENT 2022
[REDACTED]

RE: Settlement of Compliance Orders Issued for Late Reports

Dear Superintendent Walters:

1. The following Proposed Compliance Orders were issued by the Oklahoma Ethics Commission ("Commission") to RYAN WALTERS ("Walters") for WALTERS FOR STATE SUPERINTENDENT 2022 (#10425) (hereinafter referred to as "Committee"):

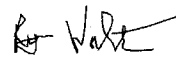
Description	Date Due	Date Filed	Type of Compliance Order	Compliance Fee Amount
LATE FILING - OVER 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 11/2/2022	11/2/2022	11/5/2022	Late Filing - Supplemental	\$600.00
LATE FILING - OVER 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 11/1/2022	11/1/2022	11/4/2022	Late Filing - Supplemental	\$600.00
LATE FILING - OVER 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/18/2022	8/18/2022	8/19/2022	Late Filing - Supplemental	\$200.00
LATE FILING - OVER 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/17/2022	8/17/2022	8/18/2022	Late Filing - Supplemental	\$200.00

LATE FILING - OVER 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/16/2022	8/16/2022	8/18/2022	Late Filing - Supplemental	\$400.00
LATE FILING: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/14/2022	8/14/2022	8/15/2022	Late Filing - Supplemental	\$200.00
LATE FILING: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/14/2022	8/14/2022	8/19/2022	Late Filing - Supplemental	\$1,000.00
LATE FILING: CONTINUING REPORT OF CONTRIBUTIONS: DUE 8/12/2022	8/12/2022	8/15/2022	Late Filing - Supplemental	\$600.00
LATE FILING - 1: CONTINUING REPORT OF CONTRIBUTIONS: DUE 6/24/2022	6/24/2022	6/28/2022	Late Filing - Supplemental	\$800.00
LATE FILING - 2: CONTINUING REPORT OF CONTRIBUTIONS: DUE 6/20/2022	6/20/2022	6/21/2022	Late Filing - Supplemental	\$200.00
LATE FILING: CONTINUING REPORT OF CONTRIBUTIONS: DUE 6/17/2022	6/17/2022	6/21/2022	Late Filing - Supplemental	\$800.00
LATE FILING: CONTINUING REPORT OF CONTRIBUTIONS: DUE 6/16/2022	6/16/2022	6/21/2022	Late Filing - Supplemental	\$1,000.00

2. In response to the compliance orders, as referenced herein, hearings were requested on behalf of Walters and Committee.
3. In settlement of the compliance orders, as referenced herein, Walters, Committee, and the Commission (collectively, "Parties") agree as follows:
 - a. The Commission agrees to reduce the compliance order fees, as referenced herein, by \$300 per late filing, resulting in a total reduced compliance fee of \$3,000.

- b. Walters and Committee agree to complete the following **no later than 60 days after this Agreement is signed by Parties**: (1) pay the \$3,000 compliance fee referenced herein, (2) attend at least one training session with Ethics Staff regarding filing requirements of candidate committees, with a specific focus on Continuing Reports of Contributions and reporting of contributors, and (3) file amended reports in the Guardian, where the Commission Staff deems appropriate, regarding contributors.
 - c. Walters and Committee also agree that failure to complete the terms of this agreement within the time period provided herein will result in the proposed compliance orders referenced herein going final and respective Final Compliance Orders being issued.
 - d. Administrative hearings for the compliance orders in this matter are now moot and unnecessary.
4. The signatures below indicate Parties agreement to the terms as provided herein.


Stephanie N. McCord _____ Date
DEPUTY DIRECTOR AND GENERAL COUNSEL
OKLAHOMA ETHICS COMMISSION


RYAN MATTHEW WALTERS _____ Date
WALTERS FOR STATE SUPERINTENDENT 2022

This offer expires Thursday, March 7, 2024 at 11:59 p.m.



OKLAHOMA ETHICS COMMISSION

12/13/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

Dear Filer:

Pursuant to Ethics Rule 6.19 of Title 74, Appendix I, Oklahoma Statutes, you are hereby ordered to pay a late filing fee. The schedule of late filing fees for Candidate Committee is published on the Ethics Commission website, www.ok.gov/ethics, and provides for the assessment of late fees of \$200.00 FOR THE FIRST DAY and \$200.00 PER DAY FOR EACH OF THE NEXT FOUR DAYS.

Continuing Report of Contributions was due on 11/2/2022, as provided in Ethics Rule 2.102. Your Report was filed on 11/5/2022. Your Report was filed 3 day(s) after it was due; therefore you are being assessed a late filing fee of \$600.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

To contest this Proposed Compliance Order, you may request a hearing within thirty (30) days of the date on this Proposed Compliance Order. If you wish to request a hearing, sign in the space indicated on the following page and return this Proposed Compliance Order, in the provided envelope, to the Oklahoma Ethics Commission. You will be notified of the time and place for the hearing.

If you have not requested a hearing or paid the fee within thirty (30) days of the date on this Proposed Compliance Order, this Order will become final, and payment will be demanded immediately.

If you have questions, please call (405) 521-3451.

Respectfully,

Ashley Kemp
Executive Director

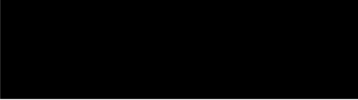


OKLAHOMA ETHICS COMMISSION

12/13/2022

PROPOSED COMPLIANCE ORDER

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Continuing Report of Contributions was due on 11/1/2022, as provided in Ethics Rule 2.102. Your Report was filed on 11/4/2022. Your Report was filed 3 day(s) after it was due; therefore you are being assessed a late filing fee of \$600.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

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Respectfully,

Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified mail sent 12/08/2022:#7022 2410 0001 2156 5448

Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

Dear Filer:

Pursuant to Ethics Rule 6.19 of Title 74, Appendix I, Oklahoma Statutes, you are hereby ordered to pay a late filing fee. The schedule of late filing fees for Candidate Committee is published on the Ethics Commission website, www.ok.gov/ethics, and provides for the assessment of late fees of \$200.00 FOR THE FIRST DAY and \$200.00 PER DAY FOR EACH OF THE NEXT FOUR DAYS.

Continuing Report of Contributions was due on 8/18/2022, as provided in Ethics Rule 2.102. Your Report was filed on 8/19/2022. Your Report was filed 1 day(s) after it was due; therefore you are being assessed a late filing fee of \$200.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

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Respectfully,

Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS

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Respectfully,

Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified mail sent 12/08/2022: #7022 2410 0001 2156 5424

Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

Dear Filer:

Pursuant to Ethics Rule 6.19 of Title 74, Appendix I, Oklahoma Statutes, you are hereby ordered to pay a late filing fee. The schedule of late filing fees for Candidate Committee is published on the Ethics Commission website, www.ok.gov/ethics, and provides for the assessment of late fees of \$200.00 FOR THE FIRST DAY and \$200.00 PER DAY FOR EACH OF THE NEXT FOUR DAYS.

Continuing Report of Contributions was due on 8/16/2022, as provided in Ethics Rule 2.102. Your Report was filed on 8/18/2022. Your Report was filed 2 day(s) after it was due; therefore you are being assessed a late filing fee of \$400.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

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Respectfully,

Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified mail sent 12/08/2022: #7022 2410 0001 2156 5400

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Continuing Report of Contributions was due on 8/14/2022, as provided in Ethics Rule 2.102. Your Report was filed on 8/15/2022. Your Report was filed 1 day(s) after it was due; therefore you are being assessed a late filing fee of \$200.00.

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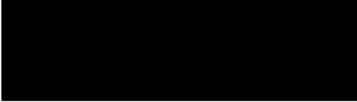


OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified mail sent 12/08/2022: #7022 2410 0001 2156 5417

Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

Dear Filer:

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Continuing Report of Contributions was due on 8/14/2022, as provided in Ethics Rule 2.102. Your Report was filed on 8/19/2022. Your Report was filed 5 day(s) after it was due; therefore you are being assessed a late filing fee of \$1,000.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

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Ashley Kemp
Executive Director

STATE CAPITOL • 2300 N. LINCOLN BOULEVARD • ROOM G-27 • OKLAHOMA CITY, OK • 73105
(405)521-3451 • FAX:(405)521-4905 • E-MAIL: ETHICS@ETHICS.OK.GOV
WEBSITE: WWW.OK.GOV/ETHICS



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified mail sent 12/08/2022: #7022 2410 0001 2156 5394

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Continuing Report of Contributions was due on 8/12/2022, as provided in Ethics Rule 2.102. Your Report was filed on 8/15/2022. Your Report was filed 3 day(s) after it was due; therefore you are being assessed a late filing fee of \$600.00.

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OKLAHOMA ETHICS COMMISSION

11/22/2022

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Continuing Report of Contributions was due on 6/24/2022, as provided in Ethics Rule 2.102. Your Report was filed on 6/28/2022. Your Report was filed 4 day(s) after it was due; therefore you are being assessed a late filing fee of \$800.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

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Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

11/22/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



Certified Mail sent 12/1/2022: 7022 0410 0003 1477 4066

Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

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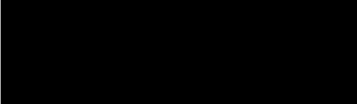


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Continuing Report of Contributions was due on 6/17/2022, as provided in Ethics Rule 2.102. Your Report was filed on 6/21/2022. Your Report was filed 4 day(s) after it was due; therefore you are being assessed a late filing fee of \$800.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

To contest this Proposed Compliance Order, you may request a hearing within thirty (30) days of the date on this Proposed Compliance Order. If you wish to request a hearing, sign in the space indicated on the following page and return this Proposed Compliance Order, in the provided envelope, to the Oklahoma Ethics Commission. You will be notified of the time and place for the hearing.

If you have not requested a hearing or paid the fee within thirty (30) days of the date on this Proposed Compliance Order, this Order will become final, and payment will be demanded immediately.

If you have questions, please call (405) 521-3451.

Respectfully,

Ashley Kemp
Executive Director



OKLAHOMA ETHICS COMMISSION

11/22/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS

Re: Continuing Report of Contributions for WALTERS FOR STATE SUPERINTENDENT 2022

Dear Filer:

Pursuant to Ethics Rule 6.19 of Title 74, Appendix I, Oklahoma Statutes, you are hereby ordered to pay a late filing fee. The schedule of late filing fees for Candidate Committee is published on the Ethics Commission website, www.ok.gov/ethics, and provides for the assessment of late fees of \$200.00 FOR THE FIRST DAY and \$200.00 PER DAY FOR EACH OF THE NEXT FOUR DAYS.

Continuing Report of Contributions was due on 6/16/2022, as provided in Ethics Rule 2.102. Your Report was filed on 6/21/2022. Your Report was filed 5 day(s) after it was due; therefore you are being assessed a late filing fee of \$1,000.00.

To pay this fee, please sign in the space indicated on the following page and return this Proposed Compliance Order with a check payable to the "Oklahoma Ethics Commission" to the Oklahoma Ethics Commission. A return envelope has been provided for your convenience. Alternatively, the fee may be paid online by logging into The Guardian System and scrolling down to the "Late Filing and Compliance Fee" section.

To contest this Proposed Compliance Order, you may request a hearing within thirty (30) days of the date on this Proposed Compliance Order. If you wish to request a hearing, sign in the space indicated on the following page and return this Proposed Compliance Order, in the provided envelope, to the Oklahoma Ethics Commission. You will be notified of the time and place for the hearing.

If you have not requested a hearing or paid the fee within thirty (30) days of the date on this Proposed Compliance Order, this Order will become final, and payment will be demanded immediately.

If you have questions, please call (405) 521-3451.

Respectfully,

Ashley Kemp
Executive Director



December 18, 2024

INVESTIGATORY SUBPOENA DUCES TECUM

Authorized by Okla. Const. art. 29, § 4(c) and Ethics Rule 6.8

Ryan M. Walters, as Chair and as Treasurer of Walters for State Superintendent 2022
c/o Trevor J. Paul and Tim Davis
777 Main Street, Suite 2100
Fort Worth, TX 76102
Via Email [REDACTED]

David Gleason
Via Email [REDACTED]

RE: Case No. 2024-03, In the matter of Ryan Walters as Chair and as Treasurer of Walters for State Superintendent 2022, alleging violations of Campaign Finance Rules

The Oklahoma Ethics Commission (“Commission”) authorized a formal investigation into the above-referenced matter on October 11, 2024, based upon a reasonable cause to believe that one or more of the Ethics Rules, 74 O.S., Chapter 62, Appx. 1, have been violated. Commission meeting minutes are available at www.ethics.ok.gov. This *Investigative Subpoena Duces Tecum* (“Subpoena”) is issued pursuant to the Commission’s constitutional subpoena power in Okla. Const. art. 29, §4(c) and Rule 6.8. This Subpoena seeks information critical to a confidential, constitutionally required investigation into violations of the Ethics Rules. Okla. Const. art. 29, § 4. It is not a subpoena issued pursuant to Title 12 of the Oklahoma Statutes.

Disclosure of information regarding the documents sought, or of the existence of the subpoena, to anyone other than the person receiving the subpoena may be considered obstruction of a constitutionally required investigation and may result in adverse action by the Commission. Any questions regarding disclosure of information should be addressed to Ethics Commission General Counsel, Margaret Kerr at (405) 522-2517.

Pursuant to Okla. Const. art. XXIX, § 4 and the Ethics Rule 6.8, you are hereby commanded to designate one or more officers, directors, managing agents or other persons in possession, custody, and control of the requested documents, and to produce and permit inspection and copying of the following documents or tangible things pertaining to the above referenced matter.

A. INSTRUCTIONS

1. This Subpoena requires only the production of the described documents and **does not** require your personal attendance. Production of these documents should be made by providing the documents to the Oklahoma Ethics Commission for inspection and copying **as soon as possible, but no later than January 7, 2025.**

Oklahoma Ethics Commission
Attn: Margaret C. Kerr, General Counsel
Oklahoma State Capitol Bld.
2300 N. Lincoln Blvd., Room G-27
Oklahoma City, OK 73105
margaret.kerr@ethics.ok.gov

2. In responding to this Subpoena, you are required to furnish all designated books, papers, documents or tangible things that are available to you, or that you may obtain by reasonable inquiry, including books, papers, documents or tangible things in the possession of you, your attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, or anyone else otherwise subject to your control.

3. Electronically stored information should be produced electronically in its originally stored format. Electronically stored information may be produced by printing any electronic documents, storing said documents on a flash drive or compact disc, or providing “screen shots” of electronically stored information if impossible or impractical to produce the information in its originally stored format or if the information requires specialized software to read the electronically stored information.

4. If you object to the production of any of the designated document request or any part of a document or category of documents, you are still required to furnish the documents or categories of documents, or parts of documents or categories of documents to which you do not object.

5. If you object to the production of any of the documents or parts of the documents you must perform the following, with respect to each document:

- a. State the date and nature of the document;
 - b. State the name of the person who wrote the document and, if it is a letter or email, the person to whom it was addressed;
 - c. Describe the subject matter of the document;
 - d. State the grounds of your objection; and
-

- e. State the name, business and residence address, and telephone number of each person who has possession, custody, or control of the document.

6. If you have any questions regarding this Subpoena, contact the Commission's General Counsel, Margaret Kerr, or Executive Director, Lee Anne Bruce Boone, at (405) 521-3451 or ethics@ethics.ok.gov.

B. DEFINITIONS

1. **"Account," "accounts" or "account(s)"** refers to any and all accounts, including but not limited to, personal, campaign, professional, merchant services, or business accounts.

2. **"Document" or "documents"** refers to any form of data compilation, regardless of the storage medium, whether produced, reproduced, or stored **on personal, campaign, professional, or business devices**, from which information can be obtained or translated, if necessary, you into reasonably usable format. This shall include but not be limited to any letter, note, memorandum, article, book, published material, computer file, report, study, statement, speech, notebook, application, calendar or calendar entry, working paper, manual, brochure, analysis, transcript, summary, diary, agreement, contract, log, appointment book, spreadsheet, graph, drawing, chart, financial statement, bank statement, bank check, deposit slip, receipt, invoice, bookkeeping entry, photograph, microfilm, sound recording, video, e-mail, web-based message such as Facebook or LinkedIn, or any other type of mechanical or electronic recording, and shall also include, but not be limited to, any draft or copy of a document.

C. DOCUMENT REQUEST

1. For the Walters for State Superintendent 2022 Committee, all documents, invoices, receipts, confirmations, credit card records, credit card statements, and bank statements and bank records evidencing or regarding funds received for or in connection with each and every item listed on the Quarterly Reports for 2021, 2022, 2023, and 2024, the 2022 Pre-Primary Report, 2022 Pre-Runoff Report, 2022 Pre-General, 2022 Post-General Reports and all Continuing Report of Contributions.

2. For the Walters for State Superintendent 2022 Committee, all documents, invoices, receipts, confirmations, credit card records, credit card statements, and bank statements and bank records evidencing or regarding funds expended for or in connection with each and every item listed on the Quarterly Reports for 2021, 2022, 2023, and 2024, the 2022 Pre-Primary Report, 2022

Pre-Runoff Report, 2022 Pre-General, 2022 Post-General Reports and all Continuing Report of Contributions.

3. For the Walters for State Superintendent 2022 Committee, all financial ledgers, check registers, and other similar financial or accounting documents—including but not limited to all QuickBooks records for said Committee, not already provided pursuant to paragraphs 1 and 2 above.

4. For the Walters for State Superintendent 2022 Committee, all documents evidencing or regarding the source, nature, or value of funds received or accepted for or in connection with said Committee.

5. For the Walters for State Superintendent 2022 Committee, all documents evidencing or regarding the name, address, occupation, or employer of each individual or sovereign entity that gave, donated, gifted, or otherwise provided funds, goods, or services for said Committee.

6. For the Walters for State Superintendent 2022 Committee, all documents evidencing or regarding the name, address, or Ethics Commission or Federal Election Commission identification number of each political action committees (also known as PAC) that gave, donated, gifted, or otherwise provided funds, goods, or services for said Committee.

7. For the Walters for State Superintendent 2022 Committee, all documents evidencing or regarding the name or address of each corporation, limited liability company (LLC), partnership, or other entity that gave, donated, gifted, or otherwise provided funds, goods, or services for said Committee.

Consistent with Article XXIX § 4 of the Oklahoma Constitution and Rule 6.8 of the Oklahoma Ethics Rules, the undersigned, as authorized by the Ethics Commission hereby issues and signs this investigative subpoena the 18th day of December, 2024.

Respectfully,

/s/ Margaret C. Kerr
Margaret C. Kerr, OBA #20515
General Counsel,
Oklahoma Ethics Commission
2300 N. Lincoln Blvd, Room G-27
Oklahoma City, OK 73105
margaret.kerr@ethics.ok.gov
Phone: (405) 522-2517

CERTIFICATION AND ACKNOWLEDGEMENT

State of _____)
)
)
County of _____)
)

I, [NAME] _____, am the
[Position] _____ for
[Employer/Organization] _____. I certify that I am an
authorized custodian of the records produced and have the authority to execute this certification.

I certify that I performed a reasonable inquiry and the subsequent documents produced
herein are, to the best of my knowledge, accurate and complete versions of that described within
the subpoena duces tecum of which are in the possession, custody, or control of Ryan Matthew
Walters and Walters for State Superintendent 2022 or any of its members, officers, employees, or
agents. I also certify that I have read the subpoena duces tecum in its entirety and followed the
instructions as provided therein.

Executed and signed on _____ day of _____, 202__ by:

Printed Name: _____

Signature: _____

Subscribed and sworn to before me this _____ day of _____, 202__.

Notary Public

My Commission Number is:

My Commission expires on:
