



October 14, 2024

Via Email and Via Certified Mail, Return Receipt Requested

Certified Mail Number: 9589-0710-5270-2178-8468-69

**TO: Walters for State Superintendent 2022
C/O Ryan M. Walters, as Chair and as Treasurer**

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 Superintendent Walters:

Within this packet is a Subpoena regarding your 2022 Committee referenced above. As you know, you signed a Settlement Agreement with the Ethics Commission on March 6, 2024. That Agreement settled the outstanding Compliance Orders referenced therein. Those Compliance Orders assessed Compliance Fees for the late filing of several reports. The enclosed Subpoena relates to alleged violations of Ethics Commission Campaign Finance Rules, *not* the late filing of any reports referred to in the March 6, 2024, Settlement Agreement.

A copy of the Agreement and all twelve (12) Compliance Orders encompassed by the Agreement are enclosed with this packet for your reference.

Please reach out with any questions or concerns.

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.

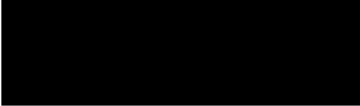


OKLAHOMA ETHICS COMMISSION

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

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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.

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Ashley Kemp
Executive Director



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Executive Director

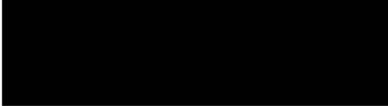


OKLAHOMA ETHICS COMMISSION

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



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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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Executive Director



OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



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

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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.

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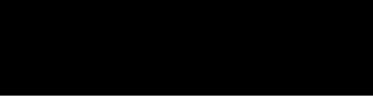


OKLAHOMA ETHICS COMMISSION

12/1/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



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

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 8/12/2022, 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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OKLAHOMA ETHICS COMMISSION

11/22/2022

PROPOSED COMPLIANCE ORDER

RYAN MATTHEW WALTERS



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

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Continuing Report of Contributions was due on 6/20/2022, as provided in Ethics Rule 2.102. Your Report was filed on 6/21/2022. 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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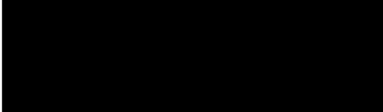


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Continuing Report of Contributions was due on 6/16/2022, as provided in Ethics Rule 2.102. Your Report was filed on 6/21/2022. Your Report was filed 5 day(s) after it was due; therefore you are being assessed a late filing fee of \$1,000.00.

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Respectfully,

Ashley Kemp
Executive Director



October 14, 2024

INVESTIGATORY SUBPOENA DUCES TECUM

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

Via Email and Via Certified Mail, Return Receipt Requested

[REDACTED]

TO: **Walters for State Superintendent 2022**
C/O Ryan M. Walters, as Chair and as Treasurer

[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 November 13, 2024.**

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
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- 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
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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 14th day of October, 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 _____, 2024 by:

Printed Name: _____

Signature: _____

Subscribed and sworn to before me this _____ day of _____, 2024.

Notary Public

My Commission Number is:

My Commission expires on:
