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December 18, 2024

TO: Walters for State Superintendent 2022  
and Ryan M. Walters, as Chair and as Treasurer  
c/o Trevor J. Paul and Tim Davis  
777 Main Street, Suite 2100  
Fort Worth, TX 76102  
Via Email [tpaul@jw.com](mailto:tpaul@jw.com) and [tdavis@jw.com](mailto:tdavis@jw.com)

David Gleason  
Via Email [dgleason@moricoli.com](mailto:dgleason@moricoli.com)

RE: **Notice of Investigation of Ethics Rules Violation**  
Case No. 2024-37, combined with Case No. 2023-27, In the Matter of Ryan Walters

Dear Ryan Walters:

At its meetings on October 11, 2024, and November 11, 2024, the Oklahoma Ethics Commission (“Commission”) determined there was reasonable cause to believe that violations of one or more provisions under Campaign Finance, Rule 2, may have occurred and, pursuant to Ethics Rule 6.7, authorized a formal investigation into the activities of Ryan Walters, Superintendent, Oklahoma Department of Education. This Notice of Investigation relates to information critical to a confidential, constitutionally required investigation into alleged violations of the Ethics Rules. Okla. Const. art. 29, § 4.

In accordance with the Ethics Commission’s investigation, below are the Ethics Rule(s) alleged to have been violated.

**Rule 2.12 Posting of Material by Elected State Officers Indicating Positions on Issues.**

If otherwise permitted by law, elected state officers, other than judicial officers, may use public funds, property or time to post materials in their offices to indicate their opinions or positions on issues, *provided these materials do not advocate the election or defeat of a clearly identified candidate for any elective office* or a vote for or against a state question or any other question to be voted upon at an election. Mere display of a photograph or similar depiction of a current or former elected federal or state officer, including autographed photographs or similar depictions, shall not be a violation of this section. (Emphasis added)

**Rule 2.16. Use of Social Media Account by State Officer.**

No Internet social-media account maintained in the name of a state officer as a state officer or state agency may be (1) used to solicit, receive or accept funds for a political party, a political action committee, a candidate or a state question campaign; (2) *used to advocate the election or defeat of a clearly identified candidate for any elective office* or a vote for or against a state question or any other question to be voted upon at an election or (3)

converted to use by a political party, a political action committee, a candidate or a state question campaign. (Emphasis added)

It has been alleged that you, Ryan Walters, have (1) posted material using state funds, property or time to advocate the election or defeat of a clearly identified candidate for an elective office; and (2) used internet social media account(s) maintained in the name of you, as a state officer, and social media account(s) maintained in the name of a state agency to advocate the election or defeat of a clearly identified candidate for an elective office. The following are the relevant facts and allegations that relate to this specific matter, so far as known to the Commission.

1. As the Superintendent of Public Instruction for the Oklahoma Department of Education, you are an elected official of the State of Oklahoma.
  2. On October 9, 2023, you issued a statement on your State of Oklahoma letterhead, stating in part “Under President Trump, Israel could rest assured that the United States had its back, but under the Biden Administration, the US arms Israel’s enemies.” See Exhibit A.
  3. On or about June 23, 2024, you reposted on X (formerly Twitter), a post from Donald J. Trump, and added a comment “Thank you @realDonaldTrump! Here in Oklahoma we are leading the country in reforming education!” See Exhibit B.
  4. On or about October 30, 2024, you posted on X stating in part “We need @realDonaldTrump back in the White House...” See Exhibit C.
  5. On or about October 31, 2024, using the “OK State Dept of Ed” page on X, you posted a picture reflecting migrant children climbing over a wall at the border. The words “From 2021 to 2023, 3,000 unaccompanied migrant children were sent to Oklahoma,” are shown on the picture. See Exhibit D.
  6. The period of 2021 to 2023 is the time when Joe Biden was president. The post on X, referenced in paragraph 5 above, gives the impression the State Department of Education does not support Joe Biden’s presidency and is advocating his defeat in the November, 2024 election. See Exhibit D.
  7. On October 31, 2024, you posted on X using your title as “Superintendent Ryan Walters” stating “The biggest threat to our economy, our kids and our families is Kamala Harris.” See Exhibit E.
  8. In another post on October 31, 2024, on X using your title as “Superintendent Ryan Walters” you stated “Time to shut the border down: elect @realdonaldtrump and @jdvance.” See Exhibit F.
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9. On November 4, 2024, you posted on your X page “Superintendent Ryan Walters” stating, in part, “Tomorrow, we will elect @realDonaldTrump.” See Exhibit G.
10. On November 5, 2024, using your X account under the title “Superintendent Ryan Walters” you posted “I just cast my ballot for President Trump.” And “Let’s get President Trump back in the White House and get this country back on the right track!” See Exhibit H.

*You have an opportunity to respond to this Notice of Investigation in writing no later than 20 days from the date of this Notice.* The response to the allegations provided in this Notice should include any documents supporting the response to the allegations. You may seek the advice of an attorney in responding to this Notice.

The Commission has further approved to initiate settlement negotiations in this matter. Prior settlement agreements of the Commission are available on our website, [ethics.ok.gov](https://ethics.ok.gov). Please contact me or Lee Anne Bruce Boone, Executive Director, to discuss this opportunity further.

I look forward to your prompt response.

Respectfully,

[/s/ Margaret C. Kerr](#)

Margaret C. Kerr, OBA #20515  
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Oklahoma Ethics Commission  
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Phone: (405) 522-2517



RYAN WALTERS

STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION  
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

FOR IMMEDIATE RELEASE  
October 9, 2023

Contact: Dan Isett  
405-570-9203

### **Walters Condemns Hamas War Against Israel**

**Oklahoma City, Okla** – State Superintendent Ryan Walters has released the following statement:

“Oklahomans are horrified at the atrocities perpetrated against the Israeli people by Iran-backed Hamas. Make no mistake: Oklahoma stands with our ally, Israel, and against these senseless acts of violence. As a sovereign and indissoluble nation, Israel’s right to self-defense is absolute. I call on the Biden Administration to act swiftly to ensure Israel has the military resources it needs to confront this shocking act of mass terrorism. Under President Trump, Israel could rest assured that the United States had its back, but under the Biden Administration, the US arms Israel’s enemies.

We are taking a fresh look at standards to ensure Oklahoma schools do not teach terrorism as a legitimate means to political ends. I hope all Oklahomans will join me in prayer for the people of Israel that peace and security will soon return to their land.”

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https://x.com/RyanWaltersSupt

**Superintendent Ryan Walters** ✓  
1,539 posts



⋮ 🔍 Follow

**Superintendent Ryan Walters** ✓  
@RyanWaltersSupt

Oklahoma State Superintendent's personal account

📍 Oklahoma City, OK 📅 Joined September 2020

569 Following 35.5K Followers

Followed by Carrie Slatton-Hodges, OklahomaOMES, and 3 others you follow



Posts Replies Highlights Media

📌 Pinned

**Superintendent Ryan Walters** ✓ @RyanWaltersSupt · Jun 23 ...  
Thank you @realDonaldTrump ! Here in Oklahoma we are leading the country in reforming education!


 **Donald J. Trump** ✓  
@realDonaldTrump

Great job by Oklahoma State Superintendent Ryan Walters on FoxNews last night. Strong, decisive,

 **Superintendent Ryan Walters**  @RyanWaltersSupt · Oct 30

This illegal immigrant wave is rushing our classrooms, and we have fentanyl pouring into our classrooms. The Biden-Harris border invasion affected our families, parents, and children. We need [@realDonaldTrump](#) back in the White House so we can fix this problem once and for all.

**LIVE**



**FOX NEWS** 6:59 MT **FOX & FRIENDS** **ELECTION NIGHT** 6 DAYS

**\$474M+ 'BILLED' TO HARRIS FOR OKLAHOMA EDUCATION COSTS**

0:20 *So resources are being diverted*

82 91 287 18K

- Home
- Explore
- Notifications
- Messages
- Grok
- Bookmarks
- Jobs
- Communities
- Premium

Post



OK State Dept of Ed @okstate

Oklahomans are kind, hard-working folks, but their patience with being asked to foot the bill for the federal government's failure has run out.



1:35 PM · Oct 31, 2024 · 243.2K Views

- 207
- 184
- 346
- 27

 **Superintendent Ryan Walters**  @RyanWaltersSupt · Oct 31

The biggest threat to our economy, our kids, and our families is Kamala Harris. Her border failures have cost our state half a billion dollars. We never had this under President Trump. We must hold Kamala accountable on November 5th!



**RYAN WALTERS | OKLAHOMA STATE SUPERINTENDENT**

**OK SCHOOL CHIEF BILLS HARRIS \$474M FOR EDUCATION COSTS, CITING ILLEGAL IMMIGRATION**

**NASDAQ** 18,159.46  
448.47  
-2.41%

**BITCOIN** 70,547.00 ▼ 2046.00 -2.82%  
**ETHEREUM** 2,543.70 ▼ 121.20 -4.55%

**LAST TRADES** ▶ **LB** 40.20 ▲ 0.05 | **LAM RESEARCH CORP (LRCX)** 73.92

64 121 485 5.9K

Case No. 2024-37, combined with Case No. 2023-27, Exhibit F

 **Superintendent Ryan Walters**  @RyanWaltersSupt · Oct 31 ...

Time to shut the border down: elect [@realdonaldtrump](#) and [@jdvance](#).

[@kamalaharris](#) is the biggest threat to our economy, our kids, and our schools.



From foxbusiness.com

 142  148  780  28K  

Case No. 2024-37, combined with Case No. 2023-27, Exhibit G

← Post

 **Superintendent Ryan Walters** ✓  
@RyanWaltersSupt

As ballots are cast tomorrow, it is a good reminder that the extremism that the left pushes does not benefit our kids. We will never back down to a radical, woke agenda. Tomorrow, we will elect [@realDonaldTrump](#)



The Left doesn't care about children. It cares about power - Washington Examiner  
Case No. 2024-37, combined with Case No. 2023-27, Exhibit A  
From washingtonexaminer.com

7:36 PM · Nov 4, 2024 · 11.7K Views

121 84 505 4

 **Superintendent Ryan Walters**   
@RyanWaltersSupt

I just cast my ballot for President Trump. The country was safer, the states were stronger, and schools were better under [@realDonaldTrump](#). Let's get President Trump back in the White House and get this country back on the right track!



*Just got through casting my ballot for President Trump.*

0:02 / 0:46    

12:25 PM · Nov 5, 2024 · **35.2K** Views