



# OKLAHOMA ETHICS COMMISSION

---

PHONE: (405) 521-3451 • FAX: (405) 521-4905 • WEBSITE: [WWW.OK.GOV/ETHICS](http://WWW.OK.GOV/ETHICS)

## Staff Memorandum 2015-02

### **Are gifts to the State of Oklahoma exempt from the various gift provisions in the Ethics Rules?**

Gifts to the State are categorically different from the gifts referenced in the Ethics Rules. The Ethics Rules relating to conflicts of interest are primarily concerned with gifts from vendors to individual state officers and employees. For example, Rule 4.9 that deals generally with vendor gifts states, "No state officer or employee shall accept any gift for himself or herself from any vendor or vendor's agent..." This emphasized language is mirrored in essentially all other conflict of interest rules and lobbyist rules. This was partially done to exempt gifts to the State from the conflicts of interest and lobbyist rules. Because of this, if a vendor or lobbyist principal wishes to make a gift to the State, such gift is outside the scope of the Ethics Rules and is unregulated by this agency.