



OKLAHOMA ETHICS COMMISSION

NOTICE OF ALLEGATIONS

Pursuant to Okla. Const. art. 29, §4 and 75 O.S., Ch. 62, App. 1, Ethics Rule 6.10

March 8, 2024

TO:

Via certified mail and email

Certified mail No.: 9589 0710 5290 042 1059 43

Ajay Pittman
2300 N. Lincoln Blvd, Rm. 544
Oklahoma City, OK 73117

RE: Case No. 2022-25, In the Matter of Ajaypittman2020, a 2020 candidate committee; Anastasia Pittman, Chair of Ajaypittman2020; [REDACTED] Ajay for House99 2022, a 2022 candidate committee; and Ayshia "Ajay" Pittman, candidate for Ajaypittman2020 and Ajay for House99 2022, as well as Chair and Treasurer of Ajay for House 99 2022.

Dear Ms. Pittman [REDACTED]

At its meeting on June 10, 2022, the Oklahoma Ethics Commission ("Commission") determined there was reasonable cause to believe that violations of one or more provisions under Campaign Finance Ethics Rule 2 may have occurred and, pursuant to Ethics Rule 6.7, authorized a formal investigation on Ajaypittman2020, its candidate, and its officers. On November 18, 2022, the Commission expanded this investigation to include Ajay for House99 2022, its candidate, and its officers. In accordance with Ethics Rule 6.10, below are allegations of violations of the Ethics Rules, Campaign Finance Ethics Rule 2, as identified by the Commission at this point in the investigation.

You have an opportunity to respond to these allegations 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. Supporting documentation provided to Commission in the response may result in the removal and/or modification of some or all of the facts and/or allegations. You may request one extension of twenty (20) additional days in which

to respond. You may seek the advice of an attorney in responding to this Notice. Any attorney representing a Respondent or Respondents in this matter must submit a letter of representation to the Commission at the address listed below in advance of, or in conjunction with, the response to this Notice.

You may request to appear before the Commission to respond orally to the allegations, so long as *you or your representative actually appear before the Commission within the time frame provided for filing the written response.* Ethics Rule 6.10. Respondents seeking to respond by oral presentation to the Commission are responsible for being aware of the date and time of Commission meetings in order to appear timely. Any requests for additional time to respond to the allegations beyond the first request for an extension are at the exclusive discretion of the Commission, not Commission staff, to grant. *Failure to respond to the allegations herein shall be deemed an admission(s).* Ethics Rule 6.10.

Submit the written response to the Oklahoma Ethics Commission by (1) email by the deadline provided herein for the response; (2) USPS mail, so long as it is postmarked by the deadline provided herein for the response; or (3) hand-delivery to the Commission office no later than 4:30 p.m. of the date of the deadline provided herein for the response.

PHYSICAL & MAILING Oklahoma Ethics Commission,

ADDRESS:

Attn: General Counsel

State Capitol, 2300 N. Lincoln Blvd., Room G-27

Oklahoma City, OK 73105

EMAIL:

Ethics

ethics@ethics.ok.gov

To review the Oklahoma Ethics Commission laws and rules, as well as the Enforcement and Compliance Guide, visit the Commission website at <https://www.ok.gov/ethics/>.

After the time for a response to these allegations has passed, the Commission may take action as provided in the Constitution and laws of the State of Oklahoma, including but not limited to, prosecution of a civil lawsuit. Monetary penalties and other remedies that may be ordered by the District Court for violation of the Ethics Rules are provided in Rule 6. Liability for such may be assessed against a committee and/or its officers. Separate monetary penalties may be assessed

against each person found to have violated the Ethics Rules in the event the District Court finds more than one person liable for a violation of the Ethics Rules.

Please be advised that this Notice only includes alleged violations of the Ethics Rules. It neither includes nor considers any allegations of violations of the criminal code or other laws.

I. FACTS

2020 State Campaign

1. Ajay Pittman, also known as Ayshia Pittman or Ayshia K. M. Pittman, successfully ran for Oklahoma House of Representatives, District 99, in 2020.
2. On November 1, 2019, Ayshia K M Pittman opened a bank account, ending in numbers 1853, at BancFirst, named "Ayshia Ajay K Pittman DBA Friends to Re-elect Ajay Pittman" (2020 bank account). This account was opened as an account for a sole proprietorship.
3. 2020 bank account was used as the bank account for Ajay Pittman's 2020 campaign for state elective office.
4. The only person on 2020 bank account's signature card is Ayshia K M Pittman, also known as Ajay Pittman.
5. Ajay Pittman deposited and withdrew funds from 2020 bank account.
6. Around \$49,516.41 2020 total deposits were made in 2020 bank account and around \$49,520.85 of total expenditures were made from 2020 bank account.
7. Among the funds deposited into 2020 bank account are checks payable to and/or memos or notes indicating the funds are for Ajay Pittman's campaign or Ajay Pittman's 2020 campaign.
8. Among the funds spent from 2020 bank account are purchases made at the following: TJ Maxx; Fashion Nova; Ross; Target; Hobby Lobby; Best Buy; Apple; AT&T; Amazon.com; Wal-Mart; WinCo Foods; Costco; Sam's Club; Homeland; Mahogany Prime Steakhouse; R and J Lounge and Supper Club; Sidecar; The Collective; Bricktown Brewery; Okie Pokie; Papa John's Pizza; Mazzio's Pizza; Domino's Pizza; Cracker Barrel; Popeyes; Charleston's; Kamp's 1910 Café; Sushi Neko; Uber Eats; Winston's; Toby Keith's I Love This Bar & Grill; Off the Hook; Broadway 10; Bar & Chophouse; Deep Deuce Grill; Cheesecake Factory; Ted's Café Escondido; Taqueria Los Desvelados; Subway; Braum's; Tamashii Ramen; Picasso Café OKC; Hatch; Waffle Champion; Cajun Corner; Packard's New American Kitchen; Hideaway Pizza; Golden Chick; Whataburger; Jamba Juice; Tropical Smoothie Café; Café Kacao; Cheever's Café; Honeybunny Biscuit Co.; Neighborhood Jam; Waffle House; Great American Bagel; Chick-fil-A; Geronimo's Bakery and Burger; IHop; Royal Crab; Sisserou's Caribbean Restaurant & Catering; La Baguette; The Jones Assembly; All About Cha; Guyutes; The Garage; Paseo Grill; Cosabella; Topper's Pizza; Holiday Donuts; Birra Craft Pizzeria; Pearl's Oyster Bar; Madison's Country Cooking; On the Border; Bimini Bait Shack; 7-Eleven; Fabric Factory; Hudiburg Buick Midwest City; Cruise Line, Industry Association; Uber; Lyft; InteleTravel; U-Haul; AC Hotel.

Oklahoma City; Ambassador Hotel OKC; Renaissance Waterford OKC; Marriott Sanibel Harbour Resort & Spa in Fort Myers, FL; American Airlines; Southwest Airlines; Remington Park; Cinemark Theater; and Lenox Skincare.

9. A total of \$14,698.00 were withdrawn from 2020 bank account via checking withdrawals and ATM withdrawals.
10. 2020 bank account was closed on September 11, 2022.
11. On February 10, 2020, Anastasia Pittman registered AJAYPITTMAN2020, Ethics ID number 10079, as the candidate committee for Ajay Pittman's 2020 campaign for Oklahoma House of Representatives, District 99 ("2020 Committee") by filing a Statement of Organization ("2020 Statement of Organization") with the Oklahoma Ethics Commission ("Commission") in The Guardian System ("Guardian"), the Commission's online reporting system.
12. 2020 Statement of Organization shows and registered Ajay Pittman as the candidate, Anastasia Pittman as the Chair, and [REDACTED]
13. 2020 Statement of Organization has not been amended.
14. Anastasia Pittman is Ajay Pittman's mother and former member of the Oklahoma Legislature.
15. The reports filed in the Guardian on behalf of 2020 Committee show \$19,076.32 of contributions were accepted and \$19,076.32 of those contributions were spent. Of those expenditures, \$17,990.50 were reported as being spent on ordinary and necessary campaign expenses and \$1,085.82 were reported as being spent on officeholder expenses.
16. The amount accepted and reported in the Guardian differs from the amount of funds accepted and spent in 2020 bank account by over \$30,000.
17. [REDACTED]
18. Upon signing and filing any document in the Guardian, [REDACTED]
By signing, electronic or otherwise, my name below, I acknowledge that the information submitted is **complete, true and accurate as of the date submitted. I understand that failure to provide such information is a violation of the Ethics Rules in Oklahoma.** I understand that I can update the information above at any time by filing and amended [Contributions and Expenditures Report/Continuing Report of Contributions/Statement of Organization]. [emphasis added].
19. The Commission opened a formal investigation at its meeting on June 10, 2022 into the activities of 2020 Committee, its candidate, and its officers.

2022 State Campaign

20. Ajay Pittman, also known as Ayshia Pittman or Ayshia K. M. Pittman, ran for Oklahoma House of Representatives, District 99, in 2022 and won after the primary election was canceled.
21. In January of 2022, upon information and belief, Ajay Pittman opened a bank account, ending in numbers 3958, at BancFirst, named "Ajay for House99 2022" (2022 bank account).
22. 2022 bank account was used as the bank account for Ajay Pittman's 2022 campaign for state elective office.
23. Ajay Pittman deposited and withdrew funds from 2022 bank account.
24. Anastasia Pittman made at least one withdrawal from 2022 bank account.
25. Upon information and belief, Anastasia Pittman was not a signatory on 2022 bank account.
26. 2022 bank account collectively accepted at least \$20,298.99 and spent around \$20,044.60.
27. Among the funds deposited in 2022 bank account are checks payable to and/or with memos or notes indicating the funds are for Ajay Pittman's campaign or Ajay Pittman's 2022 campaign.
28. Funds were deposited in 2022 bank account, starting in January of 2022.
29. Among the funds spent from 2022 bank account are purchases made at the following: Byron's Liquor; American Express Payment Ayshia Ajay Pittman; Phillips 66; QuickBooks; Walgreens; Walmart; Costco; Sam's Club; Hobby Lobby; Target; Amazon; AT&T; BestBuy; Apple; American Airlines; Southwest Airlines; United Airlines; Delta Airlines; Lyft; Uber; Renaissance Montgomery Hotel & Spa in Montgomery Alabama; Marriott Hotel in Tulsa, OK; Sheraton Hotel in Atlanta Georgia; Hilton in Culver City, CA; Marriott in Chicago, IL; Parking in Boston, MA; U-Haul; Island Delight Montgomery, AL; The Juicy Seafood Montgomery, AL; Charleston's Restaurant; Thirty Nine Restaurant at First Americans Museum; Kamp's 1910 Café; Black Walnut; Jason's Deli; Door Dash; Guyutes; Pearl's Oyster Bar; Ted's Café Escondido; Sisserou's Caribbean Restaurant and Catering; Yucatan Taco Stand; Bricktown Brewery; Blue Sushi Saki Grill Dallas, TX; Via Sophia in Washington, DC; Crown Fried Chicken in Washington, DC; Uber Eats; &pizza in Arlington, VA; National Geographic Lecture in Washington, DC; Beachside Restaurant and Bar in Marina del Rey, CA; and Jaleo by Jose Andres in Chicago, IL.
30. A total of \$955.00 were withdrawn either via checking withdrawal or ATM withdrawal from 2022 bank account.
31. On January 24, 2022, Ayshia Ajay Pittman registered Ajay for House 2022, Ethics ID number 10686, as the candidate committee for Ajay Pittman's 2022 campaign for Oklahoma House of Representatives, District 99 ("2022 Committee") by filing a Statement of Organization ("2022 Statement of Organization") with the Commission in the Guardian.

32. 2022 Statement of Organization shows and registers Ajay Pittman as the candidate, Chair, and Treasurer of 2022 Committee.
33. 2022 Statement of Organization has not been amended.
34. The reports filed in the Guardian on behalf of 2022 Committee show \$20,919.05 worth of contributions were accepted and \$20,919.05 of those contributions were spent. Of those expenditures, \$14,524.20 were reported as being spent on ordinary and necessary campaign expenses, despite Pittman being elected in the primary election, and \$6,185.43 were reported as being spent on officeholder expenses.
35. No contributions were reported before the primary or runoff elections. Despite 2022 bank account deposits of contributions in January 2022, the first contribution to 2022 Committee was not reported until 2023 in in the 2022 Pre-General Report filed February 3, 2023.
36. Ajay Pittman is the only name that appears as the person filing Reports of Contributions and Expenditures for the 2022 Committee.
37. Upon signing and filing each of the Reports of Contributions and Expenditures in the Guardian, Ajay Pittman attested to the following statement:

By signing, electronic or otherwise, my name below, I acknowledge that the information submitted is **complete, true and accurate as of the date submitted. I understand that failure to provide such information is a violation of the Ethics Rules in Oklahoma.** I understand that I can update the information above at any time by filing and amended Contributions and Expenditures Report. [emphasis added].
38. The Commission opened a formal investigation at its meeting on November 18, 2022 into the activities of 2022 Committee, as well as its candidate and officer.

Subpoena

39. Commission issued a subpoena duces tecum to Respondents Ajay Pittman, [REDACTED] 2020 Committee, and 2022 Committee, on March 2, 2023 (hereinafter referred to as "Subpoena").
40. Ajay Pittman responded on behalf of [REDACTED] 2020 Committee, and 2022 Committee on April 12, 2023.
41. Respondents have not indicated whether the subpoena production was a complete response.

II. APPLICABLE LAW

42. The following incorporates by reference all the foregoing paragraphs of this Notice as though fully set forth herein.
43. "Campaign" is defined in Ethics Rule 2.2(1) as "all activities for or against the election of a candidate for elective state office or for or against a state question."

44. "Candidate committee" is defined in Ethics Rule 2.2(3) as "the only committee authorized by a candidate to accept contributions or make expenditures on behalf of the candidate's campaign, including the campaign of a judicial retention candidate."
45. Candidate committee funds may only be used for those purposes expressed in Rule 2.43 as follows:

Contributions to a candidate committee may be used to make expenditures for **ordinary and necessary campaign expenses, for contributions to another candidate committee, for operating expenses of the committee or for other purposes not otherwise prohibited by law or these Rules.** "Ordinary and necessary campaign expenses" as used in this section are those that would not exist but for the candidate's campaign, including but not limited to staff salaries, campaign consulting fees, rent (other than for the candidate's residence or part of a residence), travel, advertising, telephones, office supplies and equipment, fundraising, individual memberships in political organizations, individual memberships in civic or charitable organizations, legal fees for the campaign, payment for campaign accounting or bookkeeping services or campaign finance reporting services and repayment of the principal and interest on a loan as permitted by these Rules. Expenditures made to a family member of the candidate for services provided to the campaign shall be no more than customary compensation for those services. Expenditures made to reimburse a candidate for personal expenditures made on behalf of the candidate committee must be made within ninety (90) days of the original expenditure and must be reported in detail as required by Rule 2.106. [emphasis added].

46. Candidate committee funds may be used for officeholder expenses. Officeholder expenses are defined in Ethics Rule 2.2(14) as follows:

ordinary and necessary expenses incurred in connection with a candidate's duties as the holder of a state elective office, provided that the expenses are not otherwise reimbursed or paid for by the state. "Ordinary and necessary expenses" are those that **would not exist but for the fact that the candidate was elected to and holds a state elective office;**... [emphasis added].

See also, Rule 2.44.

47. Any use of a candidate committee's funds to fulfill a commitment, obligation, or expense of any person—including a candidate or state officeholder—that would exist regardless of the candidate's campaign qualify as prohibited personal use of the candidate committee's funds under Rule 2.39. Ethics Rule 2.39 provides as follows:

No contributions accepted by a political party committee, a political action committee or a candidate committee may be converted by any person to personal use. **“Personal use” includes any use of funds to fulfill a commitment, obligation or expense of any person that would exist irrespective of a political party’s activities, a political action committee’s activities or a candidate’s campaign or responsibilities as holder of a state elective office,** as the case may be. “Personal use” by a candidate includes, but is not limited to, food purchased for daily consumption in the candidate’s home or supplies needed to maintain the household; clothing (excluding campaign clothing of low monetary value such as T-shirts or caps); mortgage, rent or utility payments for the candidate’s personal residence, even if part of the residence is being used for the campaign; use of a motor vehicle for noncampaign purposes or non-officeholder expenses; interest on a loan made by the candidate or the candidate’s spouse to the campaign; costs of a vacation or other trip not related to the campaign or officeholder expenses; admission to athletic events, concerts, theater or other forms of entertainment (except for events that are part of the campaign); dues in country clubs, health clubs, recreational facilities or other nonpolitical organizations and earnings from investment of contributions other than as permitted by these Rules. [emphasis added].

48. Candidate committee funds are required to be expended from the campaign’s bank account via one of two methods: check or debit card. Ethics Rule 2.95.
49. Candidate committees are required to file Reports of Contributions and Expenditures in pre-election reports during an election year and quarterly reports during non-election years that disclose all contributions accepted and spent. Ethics Rules 2.100 and 2.101.
50. Ethics Rule 1.4(A) provides that timely filing in the Guardian System is “if filed at any time on the day specified, including weekends, holidays, or when the Commission offices are closed.”
51. The Treasurer and Deputy Treasurer are responsible for the lawful expenditure of candidate committee funds. Ethics Rule 2.95.
52. The treasurer of a candidate committee is responsible for maintaining all financial records for the candidate committee, as well as the timely and accurate filing of Reports of Contributions and Expenditures per Ethics Rule 2.73. Ethics Rule 2.73 provides as follows:

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.** [emphasis added].

III. ALLEGATIONS

The following incorporates by reference all the foregoing paragraphs of this Notice as though fully set forth herein. The allegations provided are based on the Commission's knowledge at this point in the investigation. Allegations may be removed or added by the Commission as information becomes available. Additional allegations will result in supplemental notice(s) of allegations. **Commission alleges Respondents violated 75 O.S., Ch. 62, App. 1, Campaign Finance Ethics Rule 2 (collectively, "Rule" or "Rules") as follows:**

Allegation #1: Personal Use of Candidate Committee Funds

53. The following incorporates by reference all the foregoing paragraphs of this Notice as though fully set forth herein.

54. Respondents Ajay Pittman, [REDACTED] and 2020 Committee used 2020 Committee's funds for personal use in violation of Rule 2.39 upon making the following purchases not resulting from or connected to Ajay Pittman's 2020 campaign for elective state office or Ajay Pittman's duties as an officeholder:

a. Purchases at restaurants, fast-food chains, food delivery services, and convenience stores, including *but not limited to*, the following:

i. Mahogany Prime Steakhouse; R and J Lounge and Supper Club; Sidecar; The Collective; Bricktown Brewery; Okie Pokie; Papa John's Pizza; Mazzio's Pizza; Domino's Pizza; Cracker Barrel; Popeyes; Charleston's Restaurant; Kamp's 1910 Café; Sushi Neko; Uber Eats; Winston's; Toby Keith's I Love This Bar & Grill; Off the Hook; Broadway 10 Bar & Chophouse; Deep Deuce Grill; Cheesecake Factory; Ted's Café Escondido; Taqueria Los Desvelados; Subway; Braum's; Tamashii Ramen; Picasso Café OKC; Hatch; Waffle Champion; Great American Bagel; Cajun Corner; Packard's New American Kitchen; Hideaway Pizza; Golden Chick; Whataburger; Jamba Juice; Tropical Smoothie Café; Café Kacao; Cheever's Café; Honeybunny Biscuit Co.; Neighborhood Jam; Waffle House; Chick-fil-A; Geronimo's Bakery and

Burger; Royal Crab; Sisserou's Caribbean Restaurant & Catering; La Baguette; The Jones Assembly; All About Cha; Guyutes; The Garage; Paseo Grill; Holiday Donuts; Birra Birra Craft Pizzeria; Pearl's Oyster Bar; Madison's Country Cooking; On the Border; Cosabella; Topper's Pizza; IHop; Royal Crab; Bimini Bait Shack; and 7-Eleven.

- b. Purchases at grocery stores, including *but not limited to*, the following:
 - i. Wal-Mart, Sam's Club, Crest, WinCo Foods, Costco; and Homeland.
 - c. Purchases at retail stores, including *but not limited to*, the following:
 - i. TJ Maxx; Ross; Fashion Nova; Target; Amazon; Hobby Lobby; Best Buy; Apple; and AT&T.
 - d. Purchases of digital music or movie downloads, phone services, and phones or equipment from AT&T, Best Buy, and Apple.
 - e. Purchases of travel, lodging, parking, and travel amenities, including *but not limited to*, the following:
 - i. Cruise Line Industry Association; Uber; Lyft; InteleTravel; AC Hotel Oklahoma City; Ambassador Hotel OKC; Renaissance Waterford OKC; Marriott Sanibel Harbour Resort & Spa; American Airlines; Southwest Airlines; Marriott in Dallas TX; Courtyard in Washington DC; and Delta Airlines.
 - f. Purchases for a personal business venture through InteleTravel and/or Cruise Line Industry Association;
 - g. Purchases for personal maintenance, including but not limited to, Lenox Skincare;
 - h. Purchases for storage and moving expenses, including *but not limited to*, U-haul;
 - i. Purchases related to décor at Fabric Factory;
 - j. Purchase regarding an automobile at Hudiburg Buick Midwest City;
 - k. Purchases of entertainment, including but not limited to, Remington Park and Cinemark Theater; and
 - l. Improper withdrawal of \$14,698.00 worth of funds from 2020 Committee's bank account.
55. Respondents Ajay Pittman and 2022 Committee used 2022 Committee's funds for personal use in violation of Rule 2.39 upon making the following purchases not

resulting from or connected to Ajay Pittman's 2022 campaign for elective state office or Ajay Pittman's duties as an officeholder:

- a. Purchases at restaurants, fast-food chains, and food delivery services, including but not limited to, the following:
 - i. Island Delight Montgomery, AL; The Juicy Seafood Montgomery, AL; Charleston's Restaurant; Thirty Nine Restaurant at First Americans Museum; Kamp's 1910 Café; Black Walnut; Jason's Deli; Door Dash; Guyutes; Pearl's Oyster Bar; Ted's Café Escondido; Sisserou's Caribbean Restaurant and Catering; Yucatan Taco Stand; Bricktown Brewery; Blue Sushi Saki Grill Dallas, TX; Via Sophia in Washington, DC; Crown Fried Chicken in Washington, DC; Uber Eats; &pizza in Arlington, VA; Beachside Restaurant and Bar in Marina del Rey, CA; and Jaleo by Jose Andres in Chicago, IL.
- b. Purchases at liquor stores and convenience stores, including but not limited to, purchases at Byron's Liquor and Phillips 66.
- c. Purchases at retail and grocery stores, including but not limited to, the following:
 - i. Walgreens; Walmart; Costco; Sam's Club; Hobby Lobby; Target; Amazon; AT&T; BestBuy; and Apple.
- d. Purchases of travel, lodging, parking, and travel amenities, including but not limited to, the following:
 1. American Airlines; Southwest Airlines; United Airlines; Delta Airlines; Lyft; Uber; Renaissance Montgomery Hotel & Spa in Montgomery Alabama; Marriott Hotel in Tulsa, OK; Sheraton Hotel in Atlanta Georgia; Hilton in Culver City, CA; Marriott in Chicago, IL; and Parking in Boston, MA.
- e. Purchases of storage unit rent and/or moving expenses at U-Haul.
- f. Improper withdrawals of \$955.00 worth of 2022 Committee funds via checking and ATM withdrawals; and
- g. Personal credit card payments for Ayshia Ajay Pittman valued at \$2,205.52.

Allegation #2: Improper Withdrawal of Campaign Funds

56. The following incorporates by reference all the foregoing paragraphs of this Notice as though fully set forth herein.
57. Respondents Ajay Pittman and 2020 Committee withdrew a total of \$14,698.00 from 2020 bank account via checking withdrawal and ATM withdrawals in violation of

Ethics Rule 2.95, which requires expenditure of candidate committee funds to be made via check or debit card.

58. Respondents Ajay Pittman and 2022 Committee withdrew or authorized the improper unlawful withdrawal of a total of \$955.00 from 2022 bank account via checking withdrawal and ATM withdrawal in violation of Ethics Rule 2.95, which requires expenditure of candidate committee funds to be made via check or debit card.
59. Respondents Ajay Pittman and 2022 Committee made personal credit card payments for Ayshia Ajay Pittman valued at \$2,205.52 in violation of Ethics Rule 2.95, which requires expenditure of candidate committee funds to be made via check or debit card.

Allegation #3: Inaccurate Reporting

60. Respondents Ajay Pittman, [REDACTED] and 2020 Candidate Committee failed to report over \$30,000 of contributions accepted by 2020 Candidate Committee with the Commission in violation of Ethics Rules 2.100 and 2.101.
61. Respondents Ajay Pittman, [REDACTED] and 2020 Candidate Committee failed to report over \$30,000 worth of expenditures made from 2020 Candidate Committee funds with the Commission in violation of Ethics Rules 2.100 and 2.101.
62. Respondents Ajay Pittman and 2022 Candidate Committee failed to report or failed to timely report over \$20,000 worth of contributions to 2022 Candidate Committee in violation of Ethics Rules 1.4(a), 2.100, and 2.101.

Allegation # 4: Failure to Maintain Campaign Records

63. Respondents Ajay Pittman, [REDACTED], and 2020 Committee failed to maintain 2020 committee records for at least four years as required by Rule 2.73.
64. Respondents Ajay Pittman, [REDACTED], and 2022 Committee failed to maintain 2022 committee records for at least four years as required by Rule 2.73.

Respectfully,

Stephanie N. McCord

Stephanie N. McCord

Deputy Director and General Counsel,
Oklahoma Ethics Commission
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(405) 522-2514

