



[The information described herein is provided in response to the July 6, 2018 request of *Oklahoma Watch* and reflects conditions as they existed on December 31, 2017.]

July 26, 2018

Dear Oklahoma Watch,

First, Commissioner Anthony commends your efforts to improve financial transparency by candidates and elected officials. Too many people enter politics to pursue their own self-interest or their own personal financial gain. Commissioner Anthony himself took more than a 50% pay cut when he entered public service. Many, many others have left office better off than when they entered, and still others have taken advantage of the revolving door that leads to substantial private sector compensation immediately after their public sector “service”.

Commissioner Anthony has timely and fully filed a Personal Financial Disclosure form every year since the Ethics Commission required it. Note that these include several disclosures before 2014, back when more detailed information was required.

Note also that the Oklahoma Constitution, Article IX, Section 16, expressly forbids a Corporation Commissioner from having financial interest in entities the commission regulates:

“... nor shall such commissioners, or either of them, be, directly or indirectly, interested in any railroad, street railway, traction line, canal, steam boat, pipe line, car line, sleeping car line, car association, express line, telephone or telegraph line, operated for hire, in this State, or out of it, or any stock, bond, mortgage, security, or earnings of any such railroad, street railway, traction line, canal, steam boat, pipe line, car line, sleeping car line, car association, express line, telephone or telegraph line, compress or elevator companies;”

Corporation Commissioners even have a separate constitutional oath of office (Article IX, Section 17) in which they are required to swear that they do not have interest in the above-mentioned regulated entities or “all other corporations over which said Commission has jurisdiction”; Commissioner Anthony has publicly taken this oath five times.

Additionally, since 1995, Corporation Commissioners cannot raise campaign funds from any “person who is subject to the regulations of the Corporation Commission, or has interests in any firm, corporation or business which is subject to regulation by the Corporation Commission...”

except for a period from 120 days before the Primary Election until 120 days after the General Election. (Oklahoma Statutes, Title 17, Chapter 2A, Section 48.) Commissioner Anthony has faithfully abided by these restrictions, most recently in his 2018 reelection campaign.

Commissioner Anthony believes the extra restrictions – both constitutional and statutory – placed on quasi-judicial Corporation Commissioners, above and beyond most other state officials, are appropriate given its processes and the immense economic power the commission wields. He has dutifully complied with them.

Over twenty-five years ago, Commissioner Anthony relinquished all compensated (nongovernmental) board positions. In recent years, he has served (without compensation) on boards or committees of the following nonprofits: Children’s Hospital Foundation, the Committee of 100, Rotary Club 29 (Oklahoma City), the Economic Club of Oklahoma, the Oklahoma Conference of the United Methodist Church, the National Association of Regulatory Utility Commissioners (NARUC), the Mid-America Regulatory Conference (MARC), the Gas Technology Institute, and the National Petroleum Council.

Commissioner Anthony respectfully declines to make public his tax returns. No candidate at any level of government is required to do so, and such an invasive requirement compelling a comparably blunt instrument of “disclosure” could have a chilling effect on recruiting good candidates for public office. Numbers are exciting, but they can also be distracting. More important than dollar amounts are actual or potential conflicts between a candidate/official’s “interests” and the duties of the job he/she is running for or already holds. That said, Commissioner Anthony’s salary at the Oklahoma Corporation Commission is a matter of public record, and his principle investments – his retirement accounts – are invested in diversified, mass-market mutual funds.

In 2017, Commissioner Anthony only received earned income from the State of Oklahoma and had no mortgages or debt, except whatever monthly balance (paid off in its entirety) appeared on his credit card statements in any given billing cycle. His only assets held for an investment purpose were his retirement accounts which, as noted above, are invested in diversified, mass-market mutual funds or money market funds. In the last couple years he has not had any purchase, sale or exchange of real property, stocks, bonds, commodities, futures or other forms of securities except within the aforementioned retirement account mutual funds as part of their normal operations.

Again, Commissioner Anthony commends the efforts of *Oklahoma Watch* to improve financial transparency by candidates and elected officials. Disclosing and avoiding conflicts of interest are fundamental to honoring the public trust.

Sincerely,
Oklahomans for Anthony