



MISSOURI ETHICS COMMISSION

P.O. Box 1254

Jefferson City, MO 65102

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(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

June 17, 2014

Millicent Johnson
Norwood Township Democratic Club
8424 January Ave
St. Louis MO 63134

MEC No. 14E045

Dear Ms. Johnson:

The Missouri Ethics Commission considered the complaint filed against you and Norwood Township Democratic Club, a continuing committee, at its June 16, 2014 meeting. The Commission reviewed campaign finance allegations in violation of Chapter 130, RSMo; allegations of improper use of public resources for campaign purposes in violation of Chapter 115; and violation of conflict of interest laws under Chapter 105. From the facts presented, the Commission voted to dismiss this case.

The in-kind contributions and expenditures were made to support three candidates for city council of the City of Berkeley in the April 8, 2014 election and reported on the committee's 40 Day Before Election Report. The Commission reminds you of your reporting responsibilities to additionally file a Direct Expenditure Report detailing the reported expenditures that supported or opposed a candidate or ballot measure.

The Commission also considered allegations that the committee did not operate as a proper continuing committee. The investigation showed that the committee was operating as a continuing committee and not a candidate committee. In addition, the complaint alleged committee funds were improperly used to sponsor a Mayor's Super Bowl Party when the committee provided beverages for the event. Review of this allegation did not establish that the mayor conducted campaign activities during this event.

The complaint further alleged that the mayor solicited contributions from a company while it was seeking a license from the City of Berkeley. The investigation showed that, while the company received its business license from the City of Berkeley in October 2011, prior to the mayor's election, the company did not contribute to the Norwood Township Democratic Club until January 2014. While this same company later benefitted indirectly from a rezoning approved after the mayor was in office, the Commission found no evidence that the 2014 contribution was tied to the rezoning approval.

In conclusion, the Commission determined the Norwood Township Democratic Club was operating as a continuing committee during the period reviewed and not a candidate committee, and reported in-kind contributions and expenditures on behalf of candidates. Further, the Commission found there was no evidence that city resources were used for campaign events, nor that city council actions were made contingent upon campaign contributions.

Sincerely,

A handwritten signature in cursive script that reads "James Klahr".

James Klahr
Executive Director