MISSOURI ETHICS COMMISSION
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Julie A. Allen
Executive Director

August 17, 2010

Clint Zweifel
c/o Missouri Housing Development
3435 Broadway
Kansas City, MO 64111

Re: Case No. 10E084

Dear Mr. Zweifel:

The Missouri Ethics Commission, considered at the August 16, 2010 meeting, the complaint filed against you and the Missouri Housing Development Commission (MHDC). The Commission reviewed the allegation that you had a conflict of interest pursuant to Chapter 105, RSMo, in your capacity as a member of the MHDC, when you accepted campaign contributions from individuals with business before the MHDC.

On February 19, 2010, the MDHC unanimously approved recommendations of block applications before the Commission for the "out of state region." This block included an application by Sustainable Housing Solutions, LLC (SHS). In 2008, the candidate committee, Zweifel for Missouri, received $2,000 in monetary contributions from two partners of SHS. These contributions were made in response to general campaign fundraising.

The investigation did not show reasonable grounds for a violation of Chapter 105.452, RSMo. The evidence did not show that you acted or refrained from acting as a member of the MHDC as a result of the campaign contributions. There was no evidence that you advocated for SHS's application or that you held conversations with the SHS owners or staff relating to the SHS submitted application

The MHDC's adopted Conflict of Interest policy specifically authorizes commissioners to accept campaign contributions. The policy provides that the commissioners have an affirmative duty to determine whether a given contribution amounts to a conflict of interest, to notify the appropriate individuals if a conflict exists, and to recuse themselves from voting on any issue in which there is a conflict. The policy requires disclosure if an "interested party" before the MHDC communicates with a Commissioner after a proposal has been submitted. The investigation showed that you followed the policy adopted by the MHDC.

From the facts presented, the Commission voted to dismiss this case as the allegations are unsubstantiated.

Sincerely,

Julie A. Allen

Julie A. Allen, CPA, PMP
Executive Director

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