MISSOURI ETHICS COMMISSION
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James Klahr
Executive Director

July 13, 2016

Richard Gaines
Special Administrative Board
801 N 11th Street
St. Louis MO 63101

Re: File No. 16-0055-I

Dear Mr. Gaines:

The Missouri Ethics Commission considered the complaint filed against you and Special Administrative Board at its July 13, 2016 meeting. The Commission reviewed allegations that the Special Administrative Board expended public funds in violation of Sec. 115.646, RSMo, to advocate for Proposition 1 when it distributed an informational flyer about the Proposition. Proposition 1 appeared before St. Louis City voters at the April 5, 2016 election. The complainant also alleges the Board violated the conflict of interest laws when it coordinated with Friends of St. Louis Public Schools, a continuing committee, to advocate in favor of Proposition 1.

The investigation determined that the flyer did not advocate in favor of Proposition 1. The following statements appeared in both the flyer and the ballot language:

- Continue Early Childhood Education
- Expand Character Education and Alternative Education Options
- Improve Safety and Security Equipment and Personnel
- Offer Competitive Salaries for Teachers and Staff

The Board's flyer did not advocate in favor of Proposition 1 when the flyer included statements which was nearly identical to the language from the Proposition itself.

The investigation determined that the Board did not violate the conflict of interest laws. While there are particular conflict of interest statutes that may apply to school board members in situations where, for example, members are taking certain official actions for their personal benefit, the complaint, other than checking the box which alleges a conflict of interest violation, does not provide any detail to support this allegation.

From the facts presented, the Commission voted to dismiss this complaint.

Sincerely,

James Klahr
Executive Director