



MISSOURI ETHICS COMMISSION

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

James Klahr
Executive Director

October 4, 2016

Robin Smith
With Robin Smith in 2016 Committee
PO Box 68
Eureka MO 63025

Re: File No. 16-0095-I

Dear Ms. Smith:

The Missouri Ethics Commission considered the complaint filed against you and your candidate committee at its October 3, 2016 meeting. The complaint raised two separate allegations: 1) that you failed to report certain incurred expenses relating to your campaign on either the July 2016 Quarterly or the 8 Day Before Primary Election Reports; and 2) that you failed to include two Limited Liability Companies (LLCs) when you filed your Personal Financial Disclosure with the Missouri Ethics Commission.

As to the first allegation, staff review of the complaint determined that With Robin Smith in 2016 Committee filed both a July 2016 Quarterly Report and an 8 Day Before Primary Report with the Commission. Each report includes a number of expenditures made but does not report any incurred expenditures. The committee asserts it has not incurred the expenditures as alleged in the complaint and, therefore, there are no incurred expenditures to report.

Staff also reviewed the allegation that you did not include two LLCs when you filed your Personal Financial Disclosure. Staff reviewed your disclosure as well as the relevant statute, Section 105.485.2, RSMo. This statute lists the various items required to be disclosed in the statement. However, the statute does not specifically require that a filer include LLCs in the disclosure statement.¹

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 105, RSMo or Chapter 130, RSMo, and is dismissing the complaint.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Klahr".

James Klahr
Executive Director

¹ The Commission staff routinely advises overdisclosure on the Personal Financial Disclosure form.