



**MISSOURI ETHICS COMMISSION**

PO Box 1370

Jefferson City, MO 65102

[www.mec.mo.gov](http://www.mec.mo.gov)

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

James Klahr

Executive Director

November 7, 2016

Vicki Corwin  
102 N Main  
Gallatin MO 64640

Re: File No. 16-0080-I

Dear Ms. Corwin:

The Missouri Ethics Commission considered the complaint filed against you at its November 2, 2016 meeting. The Commission reviewed the allegation that you utilized public funds by allowing Deputy County Clerk Ronetta Burton to campaign in the Daviess County Courthouse during work hours. The complaint also alleges a conflict of interest due to the courthouse being a polling place.

Section 115.646, RSMo, restricts the use of public funds for campaign purposes:

No contribution or expenditure of public funds shall be made directly by any officer, employee or agent of any political subdivision to advocate, support, or oppose any ballot measure or candidate for public office. This section shall not be construed to prohibit any public official of a political subdivision from making public appearances or from issuing press releases concerning any such ballot measure.

Staff review of the complaint determined that Ronetta Burton is Deputy County Clerk and is a candidate for Daviess County Assessor. At some point during the week of March 28, 2016, Ms. Burton distributed campaign material within the courthouse. The material was only distributed during Ms. Burton's morning work break. In addition, you indicated during the investigation that you were not aware of Ms. Burton's distribution of the material at the time it occurred, but only learned about the activity later. No evidence was found to the contrary.

As to the allegation that you violated conflict of interest laws with respect to allowing campaign activities in the courthouse, Daviess County does not have any rules or policies restricting this activity. While there are state statutes that apply to electioneering activities at or near polling places, Ms. Burton's actions occurred at a time when there were no elections; therefore, the courthouse was not being used as a polling place.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 105, RSMo, or Chapter 115, RSMo and is dismissing the complaint.

Sincerely,

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

James Klahr  
Executive Director