



**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

March 1, 2017

Alexandra Johnson  
Alexandra Johnson for Comptroller  
3139 Gurney Ave  
St. Louis MO 63116

Re: File No. 17-0007-I

Dear Ms. Johnson:

The Missouri Ethics Commission considered the complaint filed against you at its March 1, 2017 meeting. The complaint alleged that you failed to timely file your Personal Financial Disclosure Statement (PFD) and also failed to timely register your candidate committee with the Commission and file the appropriate campaign finance reports. The complaint also alleged that you failed to include a paid for by disclosure on campaign material.

Staff review of this complaint found that you filed your PFD with the Board of Elections in the City of St. Louis on January 6, 2017, the same day you filed as a candidate.<sup>1</sup> The Board of Elections then forwarded the PFD to the Commission, along with the PFDs of other city candidates.

Staff reviewed the allegation that you did not timely register your candidate committee, Alexandra Johnson for Comptroller, with the Commission. Section 130.021.5, RSMo, requires that any candidate not otherwise excluded from forming a committee shall file a statement of organization within 20 days after the person becomes a committee but no later than the date for filing the first report. Staff determined that you did not meet the monetary threshold requiring you to register a candidate committee with the Commission until January 25, 2017. You filed the Statement of Committee Organization on January 27, 2017. The Statement was filed within 20 days of the committee's formation. As the monetary threshold requiring a committee to form had not yet been met until a few days before the Statement was filed, the committee complied with Section 130.021.5, RSMo.

Staff reviewed the allegation that the committee failed to comply with the paid for by disclosure requirements for campaign material. Staff reviewed a Facebook post, a website screen shot and a screen shot of a press release related to your candidacy. The paid for by requirements set out in Section 130.031.8, RSMo only apply to printed material. The electronic communications are not subject to the paid for by requirements.

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<sup>1</sup> When filing your personal financial disclosure statement, you filed it under the name Alexandra E.M. Dunn rather than Alexandra Johnson.



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

Sincerely,

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

James Klahr

Executive Director