



MISSOURI ETHICS COMMISSION

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James Klahr
Executive Director

March 2, 2017

Delores "Dee" Brown
Dee Brown for 11th Ward Alderwoman
6208 Pennsylvania Ave.
St. Louis, MO 63111

Re: File No. 17-0008-I

Dear Ms. Brown:

The Missouri Ethics Commission considered the complaint filed against you at its March 1, 2017 meeting. The complaint alleged that you failed to timely form a candidate committee and that the committee, Dee Brown for 11th Ward Alderwoman, made a variety of reporting errors on its 40 Day Before Report. These allegations included failure to report and accurately report expenditures, contributions and fundraising activities.

Staff investigation of the complaint determined that you timely filed the Statement of Committee Organization. On its 40 Day Before Report, the committee reported receiving a \$500 contribution from a third party contributor on October 5, 2016. The complaint alleged that the committee would have been required to file its Statement of Committee Organization with the Commission no later than October 25, 2016 which is within 20 days after the committee received this contribution. Upon further review, you informed staff that the \$500 was in fact a contribution you made to your campaign rather than from a third party. As a result, the first third party contribution that triggered the requirement that the committee file its Statement of Committee Organization was a \$500 contribution the committee received on November 2, 2017. The committee's filed its Statement of Committee Organization on November 9, 2017 and was timely filed.

Staff also reviewed complaints regarding the committee's 40 Day Before Report filed with the Commission on January 25, 2017. Of the various issues raised, staff review determined that the majority were not reporting violations. While staff determined that the committee failed to accurately report address information on several expenditures, staff determined that these errors were technical in nature. Staff determined that the committee did not fail to report contributions received and expenditures made.

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

Sincerely,

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

James Klahr
Executive Director