



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 29, 2017

Jesse Coulter  
Friends for Jesse Coulter  
1984 East Cherry Court  
Springfield MO 65802

Re: File No. 17-0014-I

Dear Mr. Coulter:

The Missouri Ethics Commission considered the complaint filed against you and Friends for Jesse Coulter at its March 27, 2017 meeting. You are a candidate for Springfield City Council in the April 4, 2017 municipal election. The complaint alleged that the committee failed to file either a 40 Day Before Election Report or Statement of Limited Activity with the Commission.

Staff review of this complaint determined that Friends for Jesse Coulter filed its Statement of Committee Organization with the Commission on February 3, 2017. The Statement was dated December 2, 2016.

The 40 Day Before Report was due on February 23, 2017. In lieu of a committee filing a full disclosure report, a committee can file a Statement of Limited Activity if there is total activity (contributions and expenditures) of less than \$500 during the reporting period. If there is no activity, the committee may attest to the Commission that the committee had no activity and is not required to file a Statement of Limited Activity.

Friends for Jesse Coulter submitted an attestation to the Commission that it did not receive any contributions or make any expenditures during the 40 Day Before reporting period.<sup>1</sup> Staff reviewed the committee's bank statements which supported the committee's attestation. Therefore, the committee was not required to file any report or statement with the Commission for the 40 Day Before reporting period.

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

Sincerely,

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

James Klahr  
Executive Director

<sup>1</sup> After the complaint was filed, Friends for Jesse Coulter has filed an 8 Day Before Report which reports campaign activity and was filed on March 23, 2017.