



MISSOURI ETHICS COMMISSION

PO Box 1370
Jefferson City, MO 65102
www.mec.mo.gov
(573) 751-2020 / (800) 392-8660

James Klahr
Executive Director

June 7, 2017

Raymond Gunter
506 East Martin Ave
Campbell MO 63933

Re: File No. 17-0029-I

Dear Mr. Gunter:

The Missouri Ethics Commission considered the complaint filed against you at its June 30, 2017 meeting. You are the Mayor of the City of Campbell. The complaint alleges that you violated the Missouri Constitution's nepotism provision by hiring your son as a city employee. The complaint further alleges you violated the conflict of interest laws under Chapter 105, RSMo, by utilizing public resources and employees for personal gain for yourself or a child and by hiring your girlfriend's extermination company to perform work for the City of Campbell.

Staff reviewed the allegations and determined the following:

Alleged nepotism:

Article VII, Sec. 6 of the Missouri Constitution prohibits a public officer or public employee from using his office to name or appoint to public office or employment any relative within the fourth degree, by consanguinity or affinity. An officer or employee who violates this provision is subject to forfeiture of his office or employment.

Staff determined that your son was hired by the Edna Teague Foster Trust to plant trees and shrubs around Campbell. While some of the work occurred on city property, all payments to your son were made by the Trust.

Contract with Avery Extermination:

The complaint alleges that you violated the conflict of interest laws when the city hired Avery Extermination, whose owner you were dating. Staff reviewed the complaint in relation to Section 105.452, RSMo, which prohibits an official from acting on any matter "that is so specifically designed so as to provide a special monetary benefit to such official or his spouse or dependent children . . .". That statute does not apply to this situation because you are not married to the owner of the company.

Allegations Regarding Use of City Property or Personnel:

The complaint raises numerous concerns about whether city personnel or public resources were used to personally benefit you. The allegations focus on the use of city equipment such as a brush hog, the use of city personnel to perform tasks not related to city business, and use of the



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city garage for work on non-city vehicles. Based on staff investigation, neither city resources nor city personnel were utilized for the personal benefit of yourself.

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

Sincerely,

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

James Klahr

Executive Director
