



**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

July 14, 2017

Brad Wooldridge  
312 Main St.  
Boonville MO 65233

Re: File No. 17-0031-I

Dear Mr. Wooldridge:

The Missouri Ethics Commission considered the complaint filed against you at its July 14, 2017 meeting. The complaint alleges that you failed to register and file reports with MEC for your write-in campaign for Boonville City Attorney in the April 2017 election. The complaint also alleges you violated a local ordinance, Ordinance 4440, by representing defendants in criminal cases while also serving as City Attorney.

Campaign Finance – Chapter 130, RSMo

Staff reviewed the allegation that Mr. Wooldridge failed to register a candidate committee and file campaign finance reports with the Commission. Section 130.016.6, RSMo, provides that a candidate for certain offices, including “for county office or municipal office in a city of one hundred thousand or less . . .” is not required to file an exemption statement in order to avoid the requirement of forming a committee and filing disclosure reports with the Commission, so long as the aggregate of contributions received and expenditures made do not exceed \$1,000 and the aggregate from a single contributor does not exceed \$325. If any candidate described in Sec. 130.016.6 exceeds the \$1,000 limit or \$325 limit for a single contributor, the candidate is required to form a committee. (Sec. 130.016.7, RSMo).

You purchased campaign materials with your own funds – the total amount you expended was \$963.25. As a result, you were not required to form and register a committee with the Commission nor file campaign finance reports.

Local Ordinance 4440

Ordinance 4440, Section 2-73, provides in part – “During the term of office for which he has been elected, the city attorney is prohibited from representing any party other than the city of Boonville, the state of Missouri, or any of its political subdivisions in any criminal proceeding or municipal ordinance violation case or proceeding in the 18<sup>th</sup> Judicial Circuit.”

In February 2017, the Boonville City Council considered revised Ordinance 4440. At a council meeting on April 3, 2017 (the day before the municipal election), you informed the council regarding cases then pending in the 18<sup>th</sup> Circuit Court in which you were the attorney of record. The council proceeded to adopt Ordinance 4440.



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On April 4, 2017, you were reelected as Boonville City Attorney. On April 7, 2017, you requested that the 18<sup>th</sup> Circuit appoint a special prosecutor in cases where you may have a conflict of interest. The circuit judge granted your request on April 11, 2017. You were sworn into office as city attorney that evening.

Based on staff follow-up, you confirmed that you had resolved all criminal defense cases and had not taken on any new cases since the city council's passage of the ordinance.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 130, RSMo, nor violation of local ordinances and is dismissing the complaint.

Sincerely,

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

James Klahr  
Executive Director