



**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

Phyllis Ferguson  
Friends of Ferguson  
1920 North Robberson Ave  
Springfield MO 65803

Re: File No. 17-0037-I

Dear Ms. Ferguson:

The Missouri Ethics Commission considered the complaint filed against you and Friends of Ferguson at its July 14, 2017 meeting. The complaint alleges that you used city funds to promote your candidacy for Springfield City Council when you placed a city-produced "Take 5" video on your campaign Facebook page. Further, the complaint alleges you requested two Springfield police officers accompany you when going door to door while you were campaigning.

Staff review of this complaint determined that you were a candidate for Springfield City Council in the April 2017 municipal election. After you were appointed to the council in 2015 to fill an unexpired term, city staff produced a "Take 5" video. Such videos are commonly produced for all appointed and elected city officials. Once produced, the videos are posted to the City of Springfield website where the video may be accessed by the public. The video provides background and biological information about the officeholder and does not advocate for or against a candidate for office.

Review of the complaint also determined that, in February 2017, you canvassed one street in the area you represent and were joined by two Springfield police officers. You decided to canvass the street in your role as a councilwoman in light of some recent shootings and made the request to have an officer accompany you through the Springfield Chief of Police. During the canvassing, one resident recognized you as a councilwoman and commended you for doing a good job. While your response informed the citizen that you were up for re-election in April, You did not solicit a vote from that individual.

The facts do not support a violation of either Chapter 115, RSMo, or Chapter 130, RSMo. While the "Take 5" video as well as the police officer time in canvassing with you were expenditures of public funds, neither use of public funds "advocated, supported or opposed . . . a candidate for public office." (Sec. 115.646, RSMo). These were neither in-kind contributions to nor expenditures made by your candidate committee, Friends of Ferguson. No campaign finance reporting requirements were triggered under Chapter 130, RSMo.



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From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 115 or Chapter 130, RSMo, and is dismissing the complaint.

Sincerely,

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

James Klahr  
Executive Director