



**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

August 28, 2017

Shannon Wollard  
100 W Main St  
Courthouse Annex  
Richmond MO 64085

Re: File No. 17-0038-I

Dear Ms. Wollard:

The Missouri Ethics Commission considered the complaint filed against you at its August 25 2017 meeting. The complaint alleges that you, while serving as Ray County Public Administrator, violated Missouri conflict of interest law when you directed that clients requiring supervised care be moved to different care facilities, sometimes against their will or best interest.

Staff investigation of the complaint included a review of Section 105.454.1(3), RSMo, which provides:

1. No elected or appointed official or employee of the state or any political subdivision thereof, serving in an executive or administrative capacity, shall:

....

(3) Participate in any matter, directly or indirectly, in which he or she attempts to influence any decision of any agency of the state, or political subdivision thereof in which he or she is an officer or employee or over which he or she has supervisory power, when he or she knows the result of such decision may be the acceptance of the performance of a service or the sale, rental, or lease of any property to that agency for consideration in excess of five hundred dollars' value per transaction or five thousand dollars' value per annum to him or her, to his or her spouse, to a dependent child in his or her custody or to any business with which he or she is associated unless the transaction is made pursuant to an award on a contract let or sale made after public notice and in the case of property other than real property, competitive bidding, provided that the bid or offer accepted is the lowest received;

While the complaint questions how you, as Public Administrator, reached decisions about the placement of particular clients needing services, staff did not find evidence that your placement decisions were intended to result in, or did result in, any financial benefit for either you or your spouse or dependent children.

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

Sincerely,

A handwritten signature in black ink, appearing to read "James Klahr".

James Klahr  
Executive Director