



**MISSOURI ETHICS COMMISSION**

P.O. Box 1254

Jefferson City, MO 65102

[www.mec.mo.gov](http://www.mec.mo.gov)

(573) 751-2020 / (800) 392-8660

James Klahr  
Executive Director

March 6, 2015

Samuel J. Cummings III  
Committee to Elect Samuel J. Cummings III  
2331 South 7<sup>th</sup> St Apt B  
St. Louis MO 63104

MEC No. 15-0004-I

Dear Mr. Cummings:

The Missouri Ethics Commission considered the complaint filed against you and Committee to Elect Samuel J. Cummings III at its March 5, 2015 meeting. The complaint alleged you are in violation of Section 130.031, RSMo. It alleges you issued mailers and door hangers containing an improper paid for by disclosure. The materials stated they were paid for by your candidate committee, however your 40 Day Before Report did not report these expenditures as expenditures made by the committee but rather as an in-kind contribution by you and an in-kind expenditure by your committee.

Staff review of the complaint determined because committee funds were being held by the committee's official depository and were not immediately available, you personally paid for the campaign materials and reported the in-kind contribution from yourself and the in-kind expenditure from your committee on the same campaign finance report.

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