MISSOURI ETHICS COMMISSION
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Jefferson City, MO 65102
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James Klahr
Executive Director

July 1, 2015

Center for Competitive Elections
Stuart Keating
2633 Indiana Ave
St. Louis MO 63118

MEC No. 15-0022-I

Dear Mr. Keating:

The Missouri Ethics Commission considered the complaint filed against you and Center for Competitive Elections at its June 30, 2015 meeting. The complaint alleged you improperly coordinated with Stephen Jehle, a candidate running as an Independent for St. Louis City Board of Alderman, to form Respondent Center for Competitive Elections, a continuing committee. It is alleged that the coordination was for the purpose of concealing the continuing committee's purchase of a democratic voter database from NGP Van, for the benefit of Mr. Jehle, which would not otherwise be available to him through his candidate committee.

The staff review of this complaint found the investigation did not support improper coordination between Friends of Stephen Jehle and Center for Competitive Elections in an effort to conceal campaign activity between the two. There was no evidence that Center for Competitive Elections was formed, controlled or directed by Mr. Jehle in such a way that it was not operating as a continuing committee, as defined in Section 130.011(10), RSMo. All contributions received and expenditures made on behalf of the candidate were reported by both your committee and Mr. Jehle's candidate committee.

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,

James Klahr
Executive Director