



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

February 10, 2016

R. Ryan Harding  
235 East High Street, Suite 200  
Jefferson City MO 65101

Re: File No. 15-0063-I

Dear Mr. Harding:

The Missouri Ethics Commission considered the complaint filed against you at its February 9, 2016 meeting. The complaint alleged you as the incorporator of Missouri Promise Initiative (Missouri Promise), which filed its Articles of Incorporation with the Secretary of State on August 14, 2015, failed to file a Statement of Committee Organization for the Missouri Promise Initiative with the Commission and file an initial disclosure report with MEC.

Staff review of the complaint found that that the Missouri Promise Initiative expended funds for attorney services, establishing a website, reserving social media sites and research into the viable options for pursuing potential avenues to fund college scholarships.

Despite Missouri Promise's expenditures, Missouri Promise never drafted an initiative petition to go before the voters, never filed a petition, and never supported or opposed any ballot measure. The entity was formed to receive funds and investigate the best ways to promote a scholarship program for higher education. Because these actions never resulted in an initiative petition or even a draft initiative petition, Missouri Promise did not meet the definition of a campaign committee under Section 130.011(8), RSMo. Therefore, Missouri Promise was not required to form a committee or file reports with the Commission.

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

Sincerely,

  
James Klahr  
Executive Director