MISSOURI ETHICS COMMISSION
PO Box 1370
Jefferson City, MO 65102
www.mec.mo.gov
(573) 751-2020 / (800) 392-8660

James Klahr
Executive Director

August 12, 2016

Diane Moore, Assistant Superintendent
Webster Groves School District
400 Lockwood Ave
Webster Groves MO 63119

Re: File No. 16-0049-I

Dear Ms. Moore:

The Missouri Ethics Commission considered the complaint filed against you and Webster Groves School District at its August 12, 2016 meeting. The Commission reviewed the allegation you and Webster Groves School District inappropriately utilized public funds to oppose a candidate.

Staff review determined that an individual, who is also a candidate for public office, wrote a letter to the editor which was published in a local newspaper in April 2016. The letter discussed issues regarding the school district's finances. Personnel from the school district, including individuals named in the complaint, reviewed the letter and wrote a letter to the editor in response.

Section 115.646, RSMo, provides:

> No contribution or expenditure of public funds shall be made directly by any officer, employee or agent of any political subdivision to advocate, support, or oppose any ballot measure or candidate for public office. This section shall not be construed to prohibit any public official of a political subdivision from making public appearances or from issuing press releases concerning any such ballot measure.

From the evidence reviewed, the district's letter to the editor or any related postings on its social media account did not constitute an expenditure of public funds in violation of Section 115.646, RSMo.

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

Sincerely,

James Klahr,
Executive Director