MISSOURI ETHICS COMMISSION
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James Klahr
Executive Director

August 17, 2016

Friends of St. Louis Public Schools
Harry Rich, Deputy Treasurer
3701 Grandel Square
St. Louis MO 63108

Re: File No. 16-0056-I

Dear Rich:

The Missouri Ethics Commission considered the complaint filed against you and Friends of St. Louis Public Schools at its August 12, 2016 meeting. The Commission reviewed the allegation that Friends of St. Louis Public Schools violated provisions of the conflict of interest laws, specifically that the committee improperly coordinated with the St. Louis Public Schools in distributing campaign material to voters promoting the Proposition 1 tax measure before the April 2016 election.

Staff review of the complaint determined that, beginning in February 2016, Friends of St. Louis Public Schools established offices in the main office building of the St. Louis Public School District. Friends of St. Louis Public Schools paid $2,500 per month to utilize this office space. In February and March 2016, the committee distributed campaign material advocating in favor of Proposition 1 to increase funding for the St. Louis Public Schools. At least one of the mailers included a return address which is the address for the St. Louis Public Schools. The mailer also included the following paid for by disclosure: "Paid for by the Friends of Saint Louis Public Schools, Michael P. McMillan, Treasurer."

Friends of St. Louis Public Schools has a treasurer and a deputy treasurer. Neither are public officials – as a result, the conflict of interest laws could not apply to them. Staff review determined that the St. Louis Public Schools made no contributions, either monetary or in-kind, to the committee. The committee paid the St. Louis Public Schools for the space it utilized during the period it was actively advocating in favor of Proposition 1.

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

Sincerely,

James Klahr
Executive Director