



MEC
OPINION NO.

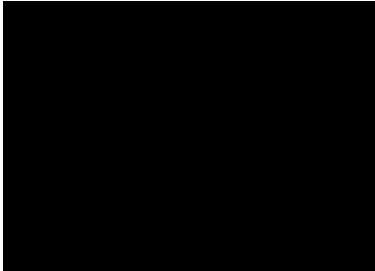
2007.11.CF.013

STATE OF MISSOURI

MISSOURI ETHICS COMMISSION
P. O. BOX 1254
JEFFERSON CITY, MISSOURI 65102

573/751-2020
1-800/392-8660

November 9, 2007



At the November 8, 2007 meeting of the Missouri Ethics Commission, your request for an opinion was discussed. The following is the Commission's Response to your questions:

a) *Is a candidate committee required to disclose on its regularly filed reports with the Missouri Ethics Commission, a detailed list of all expenditures made during the reporting through use of a credit card?*

b) *Alternatively, can candidates meet the disclosure requirement by disclosing the total of all credit card purchases, the names of the credit card payees and the dates that these aggregated payments were made?*

Given the policy of transparency in expenditure reporting throughout Section 130 of the Missouri Revised Code, committees are required to disclose the list of actual expenditures made, as defined in Section 130.011(16) RSMo, during the reporting period through the use of a credit card as provided in Section 130.041.1(4) RSMo. That section provides:

Section 130.041.1(4): ...each report shall set forth:

(4) Expenditures for the period, including:

(d) The full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the date, amount and purpose of each expenditure. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category, except that the report shall contain an itemized listing of each payment made to campaign workers by name, address, date,

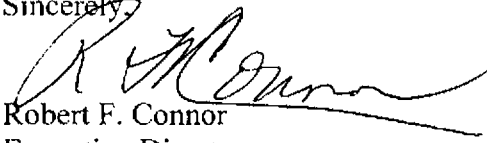
2007.11.CF.013

amount and purpose of each payment and the ~~aggregate amount~~ paid to each such worker.

Committees are advised to list the required details of the actual expenditure made, (as opposed to payment to a credit card company), on the Expenditures and Contributions Made Form. On the Report Summary a committee must list under EXPENDITURES, expenditures made this period (other than in-kind) and debts incurred this period. On the Report Summary a committee must list under MONEY ON HAND, monetary disbursements this period. This advisory opinion is consistent with Section 130.031.3 RSMo which states that no expenditure shall be made in such a manner as to conceal the actual recipient and purpose of expenditures.

The Commission also directs you to Opinion 94.12.149: *“Concerning credit card purchases, the Commission is of the opinion that contributions paid by credit card are attributable to the campaign at the time the credit card transaction is made, not when the actual money is received from the processing bank.”*

Sincerely,



Robert F. Connor
Executive Director

RFC:ez

NOTICE

Anyone examining this advisory opinion should be careful to note that an opinion of the Missouri Ethics Commission deals only with the specific request to which the opinion responded and only as to the law as it existed at the date of the response and cannot be relied upon for any other purpose or in any other manner.