



MEC
OPINION NO.

2008.06.L.003

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

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

April 18, 2008

[REDACTED]

Re: Opinion No. 2008.06.L.003

[REDACTED]

At the June 5, 2008 meeting of the Missouri Ethics Commission, your request for an opinion was discussed. The following is the Commission's Response to your questions:

If an elected official accepts more than one ticket to a sporting event or entertainment performance, uses one ticket for his or her use and then give the remainder to another person, not related to him or her and not employed by him or her in an official capacity, does the lobbyist disclose only the value of the ticket used by the elected official or the total of all tickets received and accepted on behalf of the elected official.

Section 105.473.3(a) RSMo requires a lobbyist to report: "[t]he total of all expenditures by the lobbyist or his or her lobbyist principals made on behalf of all public officials, their staffs and employees, and their spouses and dependent children." As you state that the elected official "accepts" more than one ticket, the lobbyist expenditure is made "on behalf of" the elected official. In this instance, the lobbyist must disclose the total of all tickets received and accepted on behalf of the elected official.

Sincerely,

Stacey Heislen
Interim Executive Director

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.

SH: ss