



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

December 1, 2017

Jolie Justus  
414 East 12<sup>th</sup> St.  
Kansas City MO 64106

Re: File No. 17-0057-I & 17-0059-I

Dear Ms. Justus:

The Missouri Ethics Commission considered the complaint filed against you at its November 30, 2017 meeting. The complaint alleged you violated the conflict of interest law when you, as a member of the Kansas City Airport Selection Committee, considered bids submitted to build the new single terminal Kansas City Airport while you were also employed as an attorney at Shook, Hardy & Bacon, a law firm whose clients include Burns & McDonnell, an engineering firm that submitted one of the bids considered by the committee.<sup>1</sup>

Staff review of this complaint determined that you served as a Kansas City councilwoman and, during the period relevant to this complaint, served as chair of the Airport Selection Committee to rank proposals to build a new airport terminal.

Burns & McDonnell is one of the companies which submitted a bid for the airport terminal project. During the process of considering the bids, you learned that Burns & McDonnell was a client of Shook, Hardy & Bacon.<sup>2</sup>

While you are employed by Shook, Hardy & Bacon, your duties are as Director of Pro Bono Services. In that role, your salary is not tied to the firm's proceeds received from paying clients such as Burns & McDonnell. Nor are you eligible for any bonuses based on the firm's revenues. Therefore, you had no personal financial interest at stake when you reviewed the bid submitted by Burns & McDonnell.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "James Klahr".

James Klahr  
Executive Director

<sup>1</sup> The application was submitted by Burns & McDonnell in coordination with other local companies.

<sup>2</sup> In its application, Burns & McDonnell was not represented by Shook Hardy & Bacon but by a different law firm.