



MISSOURI ETHICS COMMISSION

P.O. Box 1370  
Jefferson City, MO 65102  
[www.mec.mo.gov](http://www.mec.mo.gov)  
(573) 751-2020 / (800) 392-8660

Stacey Heislen  
Interim Director

July 23, 2018

Harry Roberts  
Friends of Harry Roberts  
4 River Ridge Terrace  
St. Joseph MO 64507

Re: MEC No. 18-0058-I

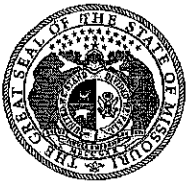
Dear Mr. Roberts:

The Missouri Ethics Commission considered the complaint filed against you and Friends of Harry Roberts at its July 23, 2018 meeting. The complaint alleged you and Friends of Harry Roberts violated the Missouri Constitution when the candidate committee accepted a contribution in excess of allowable amounts from Harry Roberts' previous candidate committee, and from a corporation.

Friends of Harry Roberts, MEC No. A131104, was registered with the Commission from October 13, 2013 through August 22, 2017 in support of candidacy for Presiding Commissioner of Buchanan County. Friends of Harry Roberts, MEC No. C171219 was registered with the Commission on August 10, 2017 in support for Mr. Roberts candidacy for State Senate, 34<sup>th</sup> District.

The committees reported a transfer of funds of \$11,490.42 from the MEC No. A131104 to MEC No. C171219 prior to terminating MEC No. A131104. A transfer of funds between candidate committees controlled by the same committee is not a "contribution", but must be reported on campaign finance disclosure reports. Staff review confirmed that this transfer of funds did not constitute local contributions in excess of the \$2,600 contribution for a candidate for State Senate.

Staff review also confirmed that the committee incorrectly reported the date of receipt of a corporate contribution. Mo. Const Art. VIII, Section 23.3(3)(a), effective December 8, 2016 prohibits a candidate committee from receiving corporate contributions. The committee originally reported receiving a contribution from Biozyme on December 22, 2016 on its January 2017 Quarterly Report. Staff confirmed that the committee actually received the contribution on November 9, 2016, prior to the effective date of the Constitutional amendment, but reported the receipt on the date the contribution was deposited into the official fund depository account. §130.036.2, RSMo provides that a contribution is considered as received and accepted on the date received. The January 2017 Quarterly Report has been amended to show the correct date of receipt.



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James Klahr  
Executive Director

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Stacey Heislen".

Stacey Heislen  
Interim Executive Director