



Missouri Ethics Commission

Elizabeth L. Ziegler
EXECUTIVE DIRECTOR

Final Action: MEC Nos. 20-0066-I through 20-0073-I, Gloria Nolan, WePower, Todd Adam Patterson, Public Progress, LLC, Katie Kaufmann, United Way of Greater St. Louis, Inc., Ready by Five, Maxine Clark, and the St. Louis Community Foundation, Inc.

Date: 11/24/2020

At its November 23, 2020 meeting, the Missouri Ethics Commission took final consideration of the complaint filed against these businesses and these individuals.

The complaint that was filed with the Commission alleged that Ms. Nolan, Mr. Patterson, and Ms. Kaufmann were acting as “elected local government official lobbyists,” without registering with the MEC. WePower, Public Progress LLC, and United Way of Greater St. Louis, their respective employers, were alleged to have knowingly employed them as lobbyists.

An “elected local government official lobbyist” is “any natural person employed specifically for the purpose of attempting to influence any action by a local government official elected in a county, city, town, or village with an annual operating budget of over ten million dollars.” Section 105.470(1), RSMo. All lobbyists are required to register with the Missouri Ethics Commission. Section 105.473.1, RSMo. “No person shall knowingly employ any person who is required to register as a registered lobbyist but is not registered pursuant to this section.” Section 105.473.7, RSMo.

The investigation undertaken by the MEC did not support the allegations in the complaint. Specifically, there was no evidence to support the assertion that Nolan, Patterson, or Kauffman were employed for the specific purpose of attempting to influence elected local officials. Accordingly, they were not required to register as lobbyists.

The complaint also alleged that Ready by Five and Maxine Clark issued a press release that failed to include a proper “Paid for by” disclosure. Section 130.031.8, RSMo, requires a “Paid for by” disclosure on “any printed matter relative to any candidate for public office or any ballot measure[.]” The press release at issue discussed a fundraising event, but it did not mention any specific ballot measure.

The complaint’s allegations against the St. Louis Community Foundation, Inc. were outside of the MEC’s jurisdiction, so they were not investigated.

From the facts presented, the Commission found no reasonable grounds exist to support a violation of Chapter 105, RSMo, and no reasonable grounds exist to support a violation of Chapter 130, RSMo. and dismissed the complaint.

Elizabeth L. Ziegler
Executive Director