



Missouri Ethics Commission

Elizabeth L. Ziegler
EXECUTIVE DIRECTOR

Final Action: MEC No. 20-0086-I, No. 20-0089-I, No. 20-0090-I, No. 20-0091-I, and No. 20-0092-I, Faye Millett

Date: 1/7/2021

At its January 6, 2021 meeting, the Missouri Ethics Commission took final consideration of complaints that had been filed against Faye Millett. Ms. Millett represents Ward 1 in the City of Pagedale. These complaints alleged violations of Missouri's campaign finance laws and conflict of interest prohibitions as discussed in detail below.

Allegation: Ms. Millett failed to form and register a candidate committee even though she accepted contributions and/or made expenditures that exceeded \$500.00.

Candidates in cities with a population of one hundred thousand or less are not required to register a candidate committee with the MEC unless "the aggregate of contributions received or expenditures made by the candidate . . . exceed one thousand dollars and the aggregate of contributions from any single contributor does not exceed three hundred twenty-five dollars[.]" Section 130.016.6, RSMo.

The MEC investigation confirmed that Ms. Millett did not meet or exceed these statutory thresholds, so she was not required to register a candidate committee.

Allegation: Ms. Millett gave a local business entity permission to place a storage container on its property, against the wishes of the Pagedale Board of Alderman, in exchange for donations to her campaign.

Section 105.452.1(1), RSMo, prohibits elected and appointed officials from acting or refraining from acting:

[I]n any capacity in which he is lawfully empowered to act as such an official or employee by reason of any payment, offer to pay, promise to pay, or receipt of anything of pecuniary value paid or payable, or received or receivable, to himself or any third person, including any gift or campaign contribution, made or received in relationship to or as a condition of the performance of an official act[.]

After reviewing documents and meeting minutes from the City of Pagedale, the MEC investigation determined that a matter involving placement of a storage container was tabled by the Board of Alderman until the full Board could be present. After that meeting, Ms. Millett provided the business owner with information related to the ordinances governing the request.

The matter involving the storage container placement was never brought before the Board of Alderman for a vote. Further, the business owner confirmed that Ms. Millett never requested any contributions. Accordingly, Ms. Millett's advice to the business owner was not an official act carried out in exchange for a contribution.

Allegation: Ms. Millett voted in favor of donations from the City of Pagedale to non-profit organizations operated by Ms. Millett and/or her family members.

Section 105.458.1(3). RSMo, prohibits the members of a legislative or governing body of any political subdivision from attempting "for any compensation . . . to influence the decision of any agency of the political subdivision on any matter[.]"

Section 105.461.1, RSMo, requires those same individuals to disclose "a substantial personal or private interest in any measure, bill, order or ordinance proposed or pending[.]" A substantial interest is defined as:

[O]wnership by the individual, the individual's spouse, or the individual's dependent children, whether singularly or collectively, directly or indirectly, of ten percent or more of any business entity, or of an interest having a value of ten thousand or more, or the receipt by an individual, the individual's spouse or the individual's dependent children, whether singularly or collectively, of a salary, gratuity, or other compensation or remuneration of five thousand dollars, or more, per year from any individual partnership, organization, or association within any calendar year[.]

The MEC investigation included a thorough review of the budget for the City of Pagedale, and the meeting minutes associated with the passage of that budget. While the budget did include donations to non-profit entities operated by Ms. Millett and her family, the investigation confirmed that they not receive any compensation for the services that they provide to those entities. Further, while Ms. Millett voted to adopt the City's budget, she did not participate in the votes that approved the donations for inclusion with the budget.

From the facts presented, the Commission found no reasonable grounds exist to support any violations of Chapter 105, RSMo, or Chapter 130, RSMo, and dismissed all of the complaints.