



# Missouri Ethics Commission

Elizabeth L. Ziegler  
EXECUTIVE DIRECTOR

## **Final Action: MEC No. 21-0026-I, Steve Jordan**

**Date: 8/10/2021**

The Missouri Ethics Commission took final consideration of the complaint filed against Steve Jordan at its August 10, 2021 meeting.

Mr. Jordan is a Commissioner in Stoddard County. The complaint filed with the MEC alleged Jordan had violated Missouri's conflict of interest law when he signed payment vouchers authorizing payment of Coronavirus Aid, Relief, and Economic Security (CARES) Act funds from Stoddard County to his business and to a business owned by his daughter.

In March 2020, the United States Congress approved the CARES Act. This act provided funding to states to be used to cover expenses incurred due to the public health emergency with respect to the coronavirus. Once funds were allocated to states, the states further allocated those funds to its counties. Stoddard County was allocated \$3,405,212.00 of Missouri's total Coronavirus Relief Fund.

The conflict of interest statutes codified in Section 105.452-105.458, RSMo, prohibit an appointed or elected official from using an office for a personal gain. Many, though not all, of these prohibitions include spouses, dependent children, and business interests. For example, Section 105.454.1(3) prohibits officials from participating:

[I]n any matter, directly or indirectly, in which he or she attempts to influence any decision of any agency of the state, or political subdivision thereof in which he or she is an officer or employee or over which he or she has supervisory power, when he or she knows the result of such decision may be the acceptance of the performance of a service or the sale, rental, or lease of any property to that agency for consideration in excess of five hundred dollars' value per transaction or five thousand dollars' value per annum to him or her, to his or her spouse, to a dependent child in his or her custody or to any business with which he or she is associated unless the transaction is made pursuant to an award on a contract let or sale made after public notice and in the case of property other than real property, competitive bidding, provided that the bid or offer accepted is the lowest received;

The investigation determined that the payment of CARES Act funding to Jordan's business was a federal grant. In other words, the decision to distribute grant money was not a decision that resulted in the performance of a service or the sale, rental, or lease of any property to the county. Accordingly, participation in the grant program is not the type of transaction that is prohibited by the conflict of interest statutes. See MEC Advisory Opinion 2020.11.CI.007 for a related discussion on CARES Act grant programs.

Further, the MEC's investigation determined that Jordan's daughter is not a dependent child, so the conflict of interest provisions would not extend to include her interests.

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

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