



Missouri Ethics Commission

Elizabeth L. Ziegler
EXECUTIVE DIRECTOR

Final Action: MEC No. 21-0047-I, Planned Parenthood of the St. Louis Region and Southwest Missouri

Date: 11/12/2021

At its November 10, 2021 meeting, the Missouri Ethics Commission took final consideration of the complaint filed against Planned Parenthood of the St. Louis Region and Southwest Missouri (Planned Parenthood).

Planned Parenthood is an IRS-recognized 501(c)(3) corporation that is organized for the purpose of promoting educational programs, working with all groups for improving family relationships and the health of mothers and children, and providing contraception and health care to women. The complaint filed with the Commission alleged that Planned Parenthood failed to register with the MEC as a campaign finance committee, and that it was required to register because it had received contributions.

A committee is:

[A] person or any combination of persons, who accepts contributions or makes expenditures for the primary or incidental purpose of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure[.]

Section 130.011(7), RSMo. However, “committee” does not include:

A corporation, cooperative association, partnership, proprietorship, or joint venture organized or operated for a primary or principal purpose other than that of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure, *and* it accepts no contributions, *and* all expenditures it makes are from its own funds or property obtained in the usual course of business or in any commercial or other transaction *and* which are not contributions as defined by subdivision (12) of this section.

Section 130.011(7)(a)c, RSMo (emphasis added).

A “contribution” is “a payment, gift, loan, advance, deposit, or donation of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office or the qualification, passage or defeat of any ballot measure[.]” Section 130.011(12), RSMo.

The complaint stemmed from information in Non-Committee Expenditure Reports filed in November 2020 by Advocates of Planned Parenthood of the St. Louis Region & Southwest Missouri (Advocates). These reports showed payments from Advocates to Planned Parenthood in support of candidates in the November 2020 general election.

The MEC's investigation determined that these payments were not campaign finance contributions but rather reimbursement for services provided by Planned Parenthood for Advocates. Specifically, Advocates used Planned Parenthood staff to create communications and to participate in phone-banking. Additionally, Advocates purchased access to a supporter list.

Furthermore, the MEC's investigation confirmed that Planned Parenthood is a corporation organized for a primary purpose other than that of attempting to influence actions of voters and does not solicit, nor receive, contributions.

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

Elizabeth L. Ziegler
Executive Director